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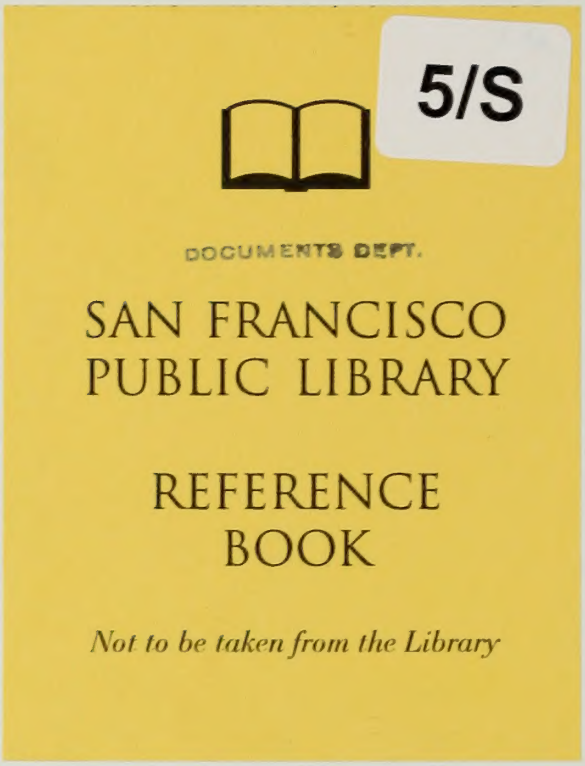

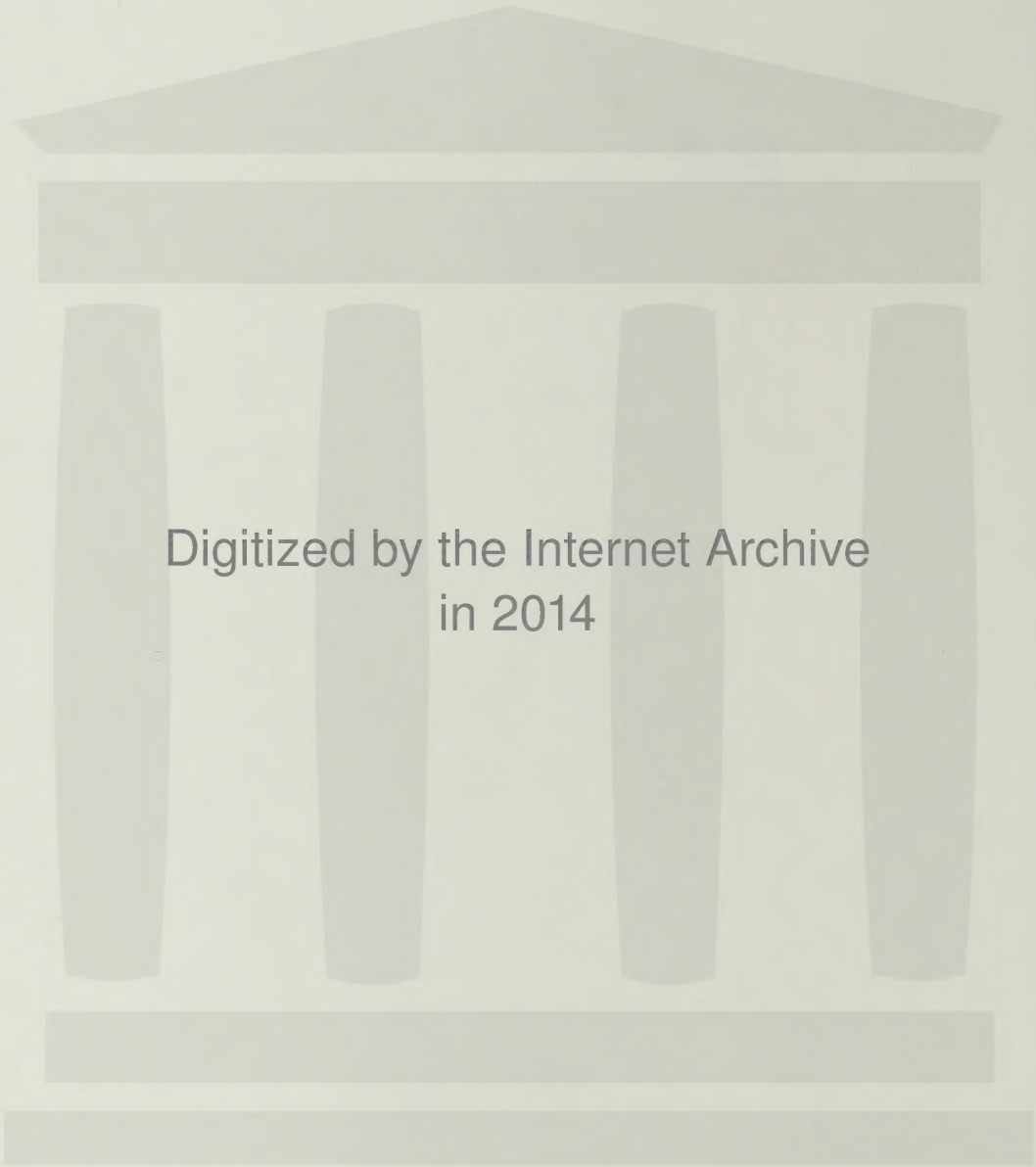
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SAN FRANCISCO GIANTS BALLPARK AT CHINA BASIN

Summary of Comments and Responses

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SAN FRANCISCO GIANTS BALLPARK AT CHINA BASIN

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SUMMARY OF COMMENTS AND RESPONSES

A. INTRODUCTION

OVERVIEW TO THE FINAL EIR

A Draft Environmental Impact Report (EIR) prepared for the San Francisco Giants Ballpark at China Basin was distributed to the public and agencies for review and comment on March 14, 1997. The Draft EIR includes a description of the proposed project, an assessment of potential effects associated with the implementation of the project or the project alternatives, proposed mitigation measures to avoid or reduce significant environmental effects, and recommended improvement measures to reduce less-than-significant effects. Comments were received at the public hearing on the Draft EIR (held on April 17, 1997 before the Planning Commission and the Redevelopment Agency Commission) and in letters and other written materials submitted during the public comment period of March 14, 1997 to April 30, 1997. The complete transcript from the public hearing and the letters received by the Planning Department, Office of Environmental Review (OER) during the public comment period are available for public review as part of the file for case #96.176E in the Planning Department office at 1660 Mission Street.

In accordance with California Environmental Quality Act (CEQA) Guidelines, Section 15132, a Final EIR must consist of:

- the Draft EIR or a revision of the draft;
- comments and recommendations received on the Draft EIR, either verbatim or in summary;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- the responses of the lead agency to significant environmental points in the review and consultation process; and
- any other information added by the lead agency.

ORGANIZATION OF THIS SUMMARY OF COMMENTS AND RESPONSES

This document contains a summary of comments received on the Draft EIR and responses to those comments. The comments are presented verbatim and are edited to delete repetition and nonsubstantive material only, to correct typographical errors and similar errata, and to clarify text as necessary. Where a particular commentor submitted multiple letters, the dates of the letters are indicated to distinguish the letters. If a commentor submitted written comments and provided oral testimony at the public hearing, this is noted in the comprehensive list of persons commenting included in Section B.

The Comments and Responses section of this report is organized by broad subject area, corresponding to the Table of Contents of the Draft EIR. Comments are further grouped by topic within each section if more than one topic is addressed; sub-topics are shown on the Table of contents. For each comment or groups of similar comments, a response has been prepared. Responses generally provide clarification of the Draft EIR. They occasionally include changes in, or additions to, the text of the Draft EIR. These modifications are indented and bolded within the response to make them easily discernible. Newly inserted words and phrases are underlined, as are new sentences or paragraphs that are incorporated into existing text. Underlining is not used if all the modification is new text. Text that is deleted is denoted with ~~strike-through~~.

Staff-initiated text changes and errata appear in Section D.

PROJECT CHANGES CONTEMPLATED BY THE PROJECT SPONSOR

At this time, the project sponsor is considering several changes to the project as described below. The project description and analysis in the EIR are not changed because the project as analyzed would have greater impacts than a project based on the contemplated revisions. Further, no final decision has been made to implement the identified changes.

Within this Summary Comments and Responses document, where the changes under consideration for the project would have a meaningful effect upon issues raised by a commentor, a qualitative assessment of the possible effects of these changes is provided. A review of these proposed changes did not indicate a potential for the generation of a new substantial adverse environmental impact that was not addressed in the Draft EIR or these responses.

Changes to the project since publication of the Draft EIR under consideration by the project sponsor include:

- Reduce the floor area of the ballpark up to 200,000 sq ft.
- Reduce the width of the upper deck canopy from 30 to 20 ft.
- Lower the height of the upper concourse and upper seating bowl by 6 ft.
- Eliminate the pedestrian arcade along King Street.
- Replace the 180 parking spaces planned under the left field bleachers with 50 parking spaces at grade.
- Eliminate the centerfield restaurant. On the ground floor and concourse levels this space would be replaced with restrooms and concessions. The public plaza area beyond centerfield would be substantially larger than originally planned. The area behind the centerfield scoreboard on the main concourse level will include an outdoor concession area which will be open year round.
- As a result of the elimination of the restaurant, lower the centerfield scoreboard 16 ft. and move it 54 ft. towards homeplate. The size of the scoreboard would not change.

REF 725.827 Sa52s

B. LIST OF COMMENTORS

San Francisco Giants
ballpark at China Basin
1997.

The following individuals submitted written comments during the public comment period of March 14, 1997, through April 30, 1997, or provided oral testimony at the public hearing on April 17, 1997, on the San Francisco Giants Ballpark at China Basin Draft EIR.

Sarah Ames (public hearing comments, April 17, 1997)

Dean Anderson, President, Grand Marina (written comments, April 28, 1997)

John H. Anderson (written and public hearing comments, April 17, 1997)

Nancy Anding (public hearing comments, April 17,1997; written comments, April 23, 1997)

Teresa Archuleta (public hearing comments, April 17, 1997)

Robert A. Arsenault (written comments, April 22, 1997)

Jerome M. Barulich (written comments, April 17, 1997)

Robert J. Batha, Staff Biologist, San Francisco Bay Conservation and Development Commission (written comments, April 30, 1997)

Frank Billeci, President, Ship Clerk's Association, Local 34 (written comments, April 30, 1997)

Louise Bird (written comments, April 25, 1997)

Ron Blatman, San Francisco Planning and Urban Research Association (written comments April 30, 1997)

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Betty A. Boatwright (written comments, April 30, 1997; petition signed by 84 people, April 30, 1997)

Peter Borodin (public hearing comments, April 17, 1997)

L. Joseph Boss (public hearing comments, April 17, 1997; written comments, April 21, 1997)

Peter Bouton (public hearing comments, April 17, 1997)

Jeffrey Brown (written comments, April 30, 1997)

Leslie S. Caplan, Project Director, San Francisco Baykeeper Waterfront Initiative (public hearing comments, April 17, 1997; written comments, April 30, 1997)

Janet Carpinelli (written comments, April 30, 1997)

Elizabeth Carney (written comments, April 29, 1997)

James Chappell, San Francisco Planning and Urban Research Association (public hearing comments, April 17, 1997)

David P. Cincotta (written comments, April 30, 1997)

Charles M. Clark (public hearing comments, April 17, 1997)

Jennifer Clary, San Francisco Tomorrow Waterfront Committee (public hearing comments, April 17, 1997)

Aidan Costello, Community Awareness Committee (written comments, April 30, 1997)

Randy Craig (public hearing comments, April 17, 1997)

Silva B. Creg (written comments, April 29, 1997)

David K. Davis (public hearing comments, April 17, 1997; written comments, April 28, 1997)

Sue Markland Day, Executive Director, California Alliance for Jobs (written comments, April 30, 1997)

Philip De Andrade, Mission Creek Harbor Association (written comments, April 9 and April 30, 1997; public hearing comments, April 17, 1997)

John B. deCastro (written comments, April 17, 1997)

James DeHart, CEQA Coordinator, Peninsula Corridor Joint Powers Board (written comments, April 30, 1997)

Penelope DePaoli (public hearing comments, April 17, 1997)

Richard Dickerson, South Beach Marina Apartments, Manager's Office (public hearing comments, April 17, 1997)

Babette Drefke (written comments, April 1, 1997; public hearing comments, April 17, 1997)

John Elberling, The Yerba Buena Commission (written comments, April 17, 1997)

Mark Erickson, Mark Erickson Studio (written comments, April 29, 1997)

Martin Fay, Rincon Point - South Beach Citizens Advisory Committee, San Francisco Redevelopment Agency (written and public hearing comments, April 17, 1997)

Arthur Feinstein, Executive Director, Golden Gate Audubon Society (written comments, April 28, 1997)

Jim Firth (public hearing comments, April 17, 1997)

Irma Flores (public hearing comments, April 17, 1997)

Martha Flores (written comments, April 17, 1997)

Ellen Garvey, Air Pollution Control Officer, Bay Area Air Quality Management District (written comments, April 30, 1997)

Yvonne Gavre (public hearing comments, April 17, 1997)

Ely M. Gilliam (written comments, undated)

Doug Gooding (written comments, April 2, 1997)

John Gott (written comments, April 30, 1997)

Abigail A. Grafton, M.A., M.F.C.C. (written comments, April 29, 1997)

Michael Gray (public hearing comments, April 17, 1997)

Nick Gravem, Down Works (written comments, April 26, 1997)

Clayton Green (public hearing comments, April 17, 1997)

James Haas, Rincon Point - South Beach Citizens Advisory Committee, San Francisco Redevelopment Agency (written and public hearing comments, April 17, 1997)

Mike Hempel (written comments, April 30, 1997)

David Herring (public hearing comments, April 17, 1997)

Michelle Herrera (public hearing comments, April 17, 1997)

Thomas A. E. Hesketh (public hearing comments, April 17, 1997)

Sue C. Hestor (public hearing comments, April 17, 1997; written comments, April 30, 1997)

Mariuccia Iaconi (written comments, March 31, 1997; public hearing comments, April 17, 1997)

Barbara Inaba (public hearing comments, April 17, 1997)

Bob Isaacson, President, Mission Creek Conservancy (written comments, April 28, 1997)

Kim Jackson, Senior Research Analyst, Hotel Employees & Restaurant Employees Union (written comments, April 30, 1997)

Michael Karasik, Bayside Village Associates (written comments, April 1, 1997; public hearing comments, April 17, 1997)

Andy Katz, Chair, San Francisco Tomorrow Waterfront Committee (written comments, April 30, 1997)

Kirk Kelsen (public hearing comments, April 17, 1997)

Chris Kelton (public hearing comments, April 17, 1997)

Roberta Kershaw (written comments, April 23, 1997)

Ellen Kernaghan (written comments, April 17, 1997)

Doug Kimsey, Planner, Metropolitan Transportation Commission (written comments, April 28, 1997)

Michael Kriozere, Urban West Associates of San Diego (written comments, April 28, 1997)

Jerome Kuykendall, Director of Planning and Policy Analysis, Golden Gate Bridge, Highway and Transportation District (written comments, April 28, 1997)

Denise M. LaPointe, President, Landmarks Preservation Advisory Board (written comments, April 30, 1997)

Andrea Laudate (written comments, April 16, 1997)

Jeffrey Leibovitz (public hearing comments, April 17, 1997; written comments, April 30, 1997)

Richard Locke, Jr. (public hearing comments, April 17, 1997; written comments, April 20, 1997)

Peter Straus, Manager of Service Planning, San Francisco Municipal Railway (written comments, April 30, 1997)

Ben Lubbon (public hearing comments, April 17, 1997)

Jerome S. Lukas, Consultants in Engineering Acoustics (written comments, April 24, 1997)

Dennis G. MacKenzie, M.A. (public hearing comments, April 17, 1997; written comments, April 22, 1997)

Scott MacPherson (written comments, April 16, 1997)

Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee (written and public hearing comments, April 17, 1997; written comments, April 28, 1997)

Jack Mc Ilroy, Staff Historical Archaeologist, Anthropological Studies Center, Sonoma State University (written comments, April 30, 1997)

Arthur L. Meader (written comments, April 30, 1997)

Richard C. Millet, Potrero Boosters and Merchants Association (written and public hearing comments, April 17, 1997)

Mary Anne Miller, San Francisco Tomorrow Waterfront Committee (public hearing comments, April 17, 1997)

Mark Miner (written comments, April 16, 1997)

Dave Mochel, Penguin Boat Co. (written comments, April 28, 1997)

John Moll, Assistant Vice-President, O'Brien Kreitzberg (written comments, April 25, 1997)

Jane Morrison, San Francisco Tomorrow Waterfront Committee (public hearing comments, April 17, 1997)

Jean Neblett (public hearing comments, April 17, 1997)

Diane Nygaard (written comments, April 1, 1997)

Donald M. Parker, Vice-President, Catellus Development Corporation (written comments, April 29, 1997)

Norman Pearce, Pier 40 Roastery & Cafe (public hearing comments, April 17, 1997)

Jerry A. Peterson (written comments, April 17, 1997)

Captain R. J. Hall, Commander, Department of California Highway Patrol, Golden Gate Division (written comments, April 18, 1997)

Sandra Peterson (public hearing comments, April 17, 1997)

Orville Pitney (written comments, April 29, 1997)

Dave Plummer, Public Land Manager, California State Lands Commission (written comments, April 30, 1997)

Jo Podvin (public hearing comments, April 17, 1997)

Neil Rabin (public hearing comments, April 17, 1997)

James Ream, Co-Chair, San Francisco Planning and Urban Research Association (written comments, April 30, 1997)

Antero A. Rivasplata, Chief, Governor's Office of Planning and Research, State Clearinghouse (written comments, April 29, 1997)

Joan Rosen (public hearing comments, April 17, 1997)

Tony Santiago (public hearing comments, April 17, 1997)

Ward Schumaker (written comments, April 22, 1997)

H. James Schafer, Samuelson, Hornaday & Schafer (written comments, April 21, 1997)

Art Siegel (public hearing comments, April 17, 1997)

David H. Snyder, Executive Director, San Francisco Bicycle Coalition (public hearing comments, April 17, 1997)

Howard Strassner, Chair, Sierra Club, San Francisco Group (written comments, April 26, 1997)

John H. Super, Commodore, Bay View Boat Club (written comments, April 29 and April 30, 1997; petition signed by 86 people)

Joel Ventresca (public hearing comments, April 17, 1997)

Steven L. Vettel, Residential Properties Group, Gladstone & Vettel (public hearing comments, April 17, 1997; written comments, April 30, 1997)

Ed Walsh (written comments, April 30, 1997)

Bill Wigert (public hearing comments, April 17, 1997)

Kent T. Woodell, Chair, Sportsmen for Equal Access (written comments, April 29, 1997)

Corinne W. Woods, Secretary, Bay View Boat Club (public hearing comments, April 17, 1997; written comments, April 27 and April 29, 1997)

Maria Woodard (written comments, April 29, 1997)

Douglas G. Wright, Principal, Douglas Wright Consulting (written comments, April 25, 1997)

Harry Y. Yahata, District Director, Department of Transportation (written comments, April 28, 1997)

Anna Yee, Chairperson, Mission Bay North Citizen's Advisory Committee (written comments, April 14, 1997)

Karita Zimmerman, Manager, Environmental Compliance, Bay Area Rapid Transit District (written comments, April 30, 1997)

C. COMMENTS AND RESPONSES

GENERAL

General Comments on the EIR

Comments

In response to the DEIR for the Giants China Basin ballpark, more than 100 users of San Francisco Bay and the China Basin waterfront have signed the attached petition. We request that the impact of the Stadium on the waterfront and boating community be recognized and addressed in the planning process for the stadium. (John H. Super, Commodore, Bay View Boat Club)

In response to the DEIR for the Giants China Basin ballpark, more than 80 residents and recreational, business and industrial users of the China Basin area from Channel to 16th Streets, 4th to Owens Streets, have signed the attached petition. We request that the impact of the stadium on our community be recognized and addressed in the planning process for the stadium. (Betty A. Boatright)

The EIR for the Giants Ballpark must address and mitigate the impacts on Potrero Hill for:

- Traffic
- Noise
- Pollution (Light And Waste)
- Parking
- Access for Residents During Events (John deCastro)

Response

These comments raise general concerns on the completeness of information in the EIR. Where commentors raise specific questions on the content of the EIR, responses are found herein, organized by environmental topic. Please see the table of contents for organization of response topics.

San Francisco Redevelopment Agency

Comment

It also should be a goal of the Redevelopment Agency to strongly endorse CalTrans' plans to extend to Market Street in order to ensure its continued health and viability. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Response

The Board of Supervisors has taken a position to endorse CalTrain Peninsula commuter service to extend to Market Street. The SFRA supports the Board's position. Although the commentor has suggested that the SFRA adopt the endorsement of the CalTrain plans as a goal, this comment does not address the adequacy of the EIR and so no further response is required.

EIR Organization

Comment

160 pages separate some of the photomontages from their base/comparison images. e.g. Figure IV.C.2 photosimulation is on page IV.29 - that's 161 pages after Figure III.C.6 on page III.53 (the base photograph). This separation makes comparison of results cumbersome, particularly for the graphically impaired. We respectfully request that any new images be presented be either: a.Loose in a packet with references to relevant text or b.Bound in logical groups with references to major relevant text locations. (Joel Ventresca)

Response

Chapter III, Environmental Setting, describes existing conditions for each topic analyzed in the EIR. Chapter III, Section D., Visual Quality and Lighting, includes photographs of existing views of the project site and vicinity. Views presented in photosimulations are found in Chapter IV, Environmental Impacts, to illustrate conditions that would occur with the project. The EIR table of contents identifies all graphics and guides the reader for comparison of figures with existing setting and with project conditions.

Editorial

Comment

As a point of reference, while I remain an "Interested Person" in this process, I would like to point out that in reference to page IX.4 of the Draft, I am listed as an "Interested Person" under "Clock Tower Lofts," and in that this may give the impression that I represent the Clock Tower Lofts Homeowners Association, I would like to clarify that I represent only myself. I am, however, also a member of the Rincon Point-South Beach Citizen's Advisory Committee to the San Francisco Redevelopment Agency, and I note that many of my fellow members are listed on page IX.8, so regardless of how and/or where I am listed, I am corresponding only as an individual that remains interested in this proposed project and that I am an individual that wishes to remain on the distribution list for this project. (John Gott)

Response

The Final EIR has been amended to reflect the commentor's request to be listed as an individual commentor. The commentor's name has been moved from p. IX.4 to p. IX.8 of the EIR.

Comment

Page IV.286: Page reference in the first sentence is incorrect. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

EIR p. IV.286 has been revised as follows:

> **Site investigations indicate that portions of surface and subsurface soil and groundwater at the ballpark site are contaminated (see III.I Contamination and Environmental Risk, ~~pp. III.56 - III.57~~ pp. III.156 - III.157, and III.J. Water Quality and Aquatic Ecology, pp. III.176 - III.178.**

Socioeconomic Effects

3Com Park

Comment

The EIR does not discuss the secondary physical impacts that could occur from the economic impact of the loss of income around 3Com Park. (Scott MacPherson)

Response

Economic change could occur from the relocation of ballpark jobs from 3Com Park to the China Basin site or the decrease in patronage of existing commercial areas surrounding 3Com Park. As is indicated in the Initial Study, p. A.17, it is likely that at least some of China Basin ballpark operations jobs would be filled by persons currently employed at 3Com Park; all employees would be from the Bay Area regional workforce. Thus, most jobs would be relocated, not lost.

Fiscal Concerns

Comments

Also, I'm a property owner. I have an investment there. I'm concerned about my investment. I pay taxes. I do not wanted my tax money to subsidize some very wealthy people to build a ballpark stadium. (Joan Rosen)

It will be so bad that people will avoid coming to Downtown San Francisco on event days either for business or for pleasure. The Giants say that the Ballpark will bring more money to the City. This is not true, it will bring more money to the Giant Owners, but not to other City businesses. Will you go to restaurant or attend a business appointment, if you cannot find parking within many blocks or a mile away? (Jerry A. Peterson)

[Has] any of our city officials analyzed the financial position of the Giants, and considered that if they do not get the attendance that they project, the City will be left with an empty stadium and terrible financial burdens. (Will the current 7500 attendance at Giants games bring enough revenue?) Even Senator Kopp says that Sports Teams do not bring revenue to the

Cities, when he speaks of the 49ers, though he supported the Giants Ballpark. Financial health is also an important aspect of environmental impact. (Jerry A. Peterson)

The Giants, hopefully, will step up to the plate -- I'll use that analogy -- and help provide for these new youth programs that are being initiated in San Francisco. That is a good public relations vehicle for them, and I hope they pick up that, and pick up speed there. (Ben Lubbon)

I believe everyone in the city can benefit from this ballpark. I believe it is a tremendous opportunity to create an educational facility with an emphasis on creating educational programs, prevention, guidance, counseling. I believe the EIR can also address to help everyone understand the process, as difficult as it is, that the provision for the outcome will

bring tremendous benefit to our kids in the future. The educational benefits I believe have not even been tapped into yet. The resources that the ballpark can provide for the kids who can't be here to speak for the future I believe is overwhelmingly positive and can bring hope and understanding to the people who are dealing with these difficult issues in their own backyards, to realize the benefits that can be for their families and all of us as well. (Dennis MacKenzie)

Property values will plunge. The ballpark will stunt or stop the continued growth and vitality of this area. (Janet Carpinelli)

There is an appreciation of property. We know that. Property values are going to go up in South Beach. I love South Beach. When I say I live in South Beach, people say Miami, and I say no, San Francisco. But I just had an 11.9 rent hike. And I know I have friends who live on 1700 California and they pay $3,000, but they do have a lot more floor space. South Beach is great. I want it to remain great. I respect and hope that we can get rent control, because we do have to tolerate all this noise and even -- it is my choice to live there. I choose to live there. And just with the bridge I get rubber and dust on my window sill this thick. But it is my choice to live there, and I love to live there. And I hope everybody goes to Pickled Ginger and starts eating so that place doesn't close. But renters are due -- I believe. (Ben Lubbon)

If these impacts are not mitigated successfully and consistently, this future South of Market gridlock will not just greatly harm San Francisco's quality of life, but in fact cause serious economic harm by increasing business costs, and by discouraging people to visit downtown San Francisco. (John Elberling)

Response

The comments request information on socioeconomic effects of ballpark activities. As discussed in CEQA Guidelines Section 15131, socioeconomic information can be used to trace a chain of cause and effect on physical environmental conditions; changes in socioeconomic conditions in themselves are not considered significant effects, and are not required analyses in an EIR. For effects related to traffic congestion, see Transportation and Circulation, Traffic Impacts. Neighborhood effects are discussed under Land Use, Neighborhood Effects/Quality of Life, of this document.

PROJECT DESCRIPTION

Uses of the Ballpark

Comments

Page II.3: It is inaccurate to state that use of the ballpark for major civic and entertainment events and for an enclosed amphitheater are considered "essential" objectives. The Giants stated during the campaign that they were not essential elements of the project, and they are not stated as one of the purposes of Proposition B, set forth in Planning Code Section 249.18. (Steven L. Vettel, Residential Properties Group)

Non-baseball events should not be allowed Fridays through Sundays. The "Baseball Only" concept was heavily promoted by the Giants in their campaign and we believe they told the truth. (L. Joseph Boss)

Since the voters of San Francisco approved a baseball park and not a rock concert stage, what is the justification for studying 5 such events at this location, rather than 0 or 12 (as mentioned in scoping document)? (San Francisco Tomorrow Waterfront Committee)

Response

Proposition B amended the City Planning Code by adding Section 249.18, Northeast China Basin Special Use District. The major purpose of creating the special use district was, as stated in Proposition B, "to accommodate the development of an open-air ballpark for Major League Baseball with a maximum of 45,000 seats with related commercial uses, including, but not limited to, general office, shops and other retail, restaurants, live music performances and other forms of live entertainment..."

Proposition B also provided that conditional uses in the Northeast China Basin Special Use District are "[a]n open air ballpark with a maximum seating capacity of 45,000, assembly and entertainment uses under Section 221 of this Code, with associated parking, and various uses accessory to or related to ballpark and assembly and entertainment uses, including sports clubs, restaurants, and retail shops, shall all be permitted as conditional uses."

As described above, Proposition B contemplated uses of the ballpark in addition to baseball. This is consistent with the manner in which other, similar ballparks are used. The proposed uses for the ballpark would be part of the Conditional Use Authorization for the project.

Type and Number of Events

Comments

I found out that during the baseball season, these are the days that they will be playing baseball, from April, May and June, and then July, August, September. It is virtually every weekend for six months. It affects my business because I depend -- a lot of my business comes from the South Beach Harbor.

They have also asked to have 30 to 40 independent events, concerts and things, tentative. When you start plugging those in, it starts filling up the year even more. And they want five major events...January and February it is pretty much no man's land down there any way.

So, when we look at the use of the area, I highly recommend that we look at it as proposed in their original marketing as a baseball-only facility. And as we look at the use for these tentative events and special events, they are on an event by event and approved through a citizens committee so that we don't end up with a Pac Bell campus down there. We do have a neighborhood, and we want to respect that neighborhood. (Norman Pearce)

There will be a limit on non-baseball events per year for outdoor, open air events of any nature whatsoever. The maximum number shall be three. The Giants can meet with a representative group (to be further defined) of residents of the neighborhood and request specific events in excess of three on a case by case basis, but only if the 2/3 vote of the representative group allows such additional events. (Michael Karasik, Bayside Village Associates)

128 events per year are planned, but the Giants are in fact allowed unlimited numbers of events. Just from what is planned, it could result in 2-3 events per week all year. (Jerry A. Peterson)

Page V.1: Lighting: Additional measures are necessary to mitigate the significance adverse light and glare impacts to South Beach residents associated with evening events at the ballpark....The number of evening events should be limited. (Steven L. Vettel, Residential Properties Group)

Noise is not a concern of the Giants and so is not included in their project. This stadium is slated for additional concert use 45 times a year. This means the stadium structure will be used 58% of the time for a use it was not designed for. It also means the citizens of San

Francisco will have to put up with the impossible traffic, decibel levels just below that of a jet taking off (according to the EIR), air quality levels below the state standards, 58% more of the time so that the Giants corporation can make more money! Baseball games are one thing but this tacked on use should not be part of the project scope. (Nancy Anding)

Project should facilitate creation of a Special Use District with a neighborhood component represented in any review of special event permit applications. (Michael Kriozere, Urban West Associates of San Diego)

I have been told that the stadium may also be used for "other events". Baseball is one thing but rock concerts etc. is another type of entertainment that draws a completely different type of crowd. I would have additional worry knowing that many boats are within a beer can throw of the gate and down wind of any fireworks display. Will the city have control and issue permits over these other events and be responsible for the outcome? (David Davis)

The political campaign stressed a baseball stadium only, and that the economics worked for the Giants without outside events. Not only are they introducing this notion, but there has been no attempt to regulate the standards for these type of events, nor has any limit been placed on the allowable events. Will motorcross be allowed? Stock car racing? (Michael Karasik, Bayside Village Associates)

We need to address what outside event -- what other outside events, what impact they will have on this area. The EIR - - DEIR did not address that as a significant issue or having a significant impact. (Richard Dickerson, South Beach Marina Apartments)

The noise level is not included in the project. We are not really addressing the problem of noise. They have come right out and said that concert use, rock concerts are going to happen in this stadium, 60 percent of the time. There are 81 ball games, but 60 percent over that is concert. I urge you, please, please reduce this number. (Nancy Anding)

Response

The project would contain a 42,000-seat ballpark as described on p. II.13. As described on pp. II.21 - II.22, events at the ballpark would include about 80 major league baseball games during the baseball season, which runs from April through September, or October for post-season games. Up to 13 weekday afternoon games beginning at 12:35 p.m. could occur; the remaining approximately 67 games would be weekday and weekend night games beginning at 7:35 p.m., and weekend day games beginning at 1:05 p.m. The ballpark could also be used for post-season and exhibition games.

Also as noted on pp. II.21 - II.22, non-baseball events that could occur at the ballpark include music and entertainment presentations, conferences, and large civic gatherings. Allowable uses at the ballpark could be defined in the Conditions of Approval.

According to the project sponsor, non-baseball maximum-capacity events, accommodating 50,000 people or more by providing temporary seating on the field, would be limited to five per year.

The project sponsor has provided clarification that no more than 20 open-air, non-baseball events with from 15,000 to 42,000 people in attendance would be held annually in the ballpark. Additional smaller open-air events could be held. Of the total number of open-air events, not more than 12 would be concerts with amplified music or other similarly noisy events.[1] The number of open-air concerts could thus be about 15 percent of the number of ballgames.

The first sentence on p. II.22 of the EIR has been deleted and replaced with the following:

> **In addition to the five maximum-capacity events, the ballpark could be used for up to 20 other open-air non-baseball events with attendance ranging from 15,000 to 42,000 people. Additional smaller open-air events could be held. Of the open-air non-baseball events, no more than 12 would be concerts with amplified music, or similarly noisy events.[3]**

The following note has been added at the end of p. II.31:

> **3. Jack F. Bair, Esq., Vice President and General Counsel, San Francisco Giants, June 2, 1997.**

As noted on p. II.22 of the EIR, other smaller, non-baseball events could be held within a temporary, enclosed amphitheater erected on the infield and lower grandstand areas. This temporary structure could be used for 30 to 40 music and other events per year with from

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1. Jack F. Bair, Esq., Vice President and General Counsel, San Francisco Giants, June 2, 1997.

5,000 to 15,000 people in attendance. The number of events in the enclosed amphitheater could be up to 50 percent of the number of ballgames.

The project sponsor would control the scheduling of non-baseball events to minimize potential conflicts between peak-hour commute traffic and traffic exiting from or going to the ballpark for such events.

The following paragraph has been added on p. II.22 of the EIR before the heading:

> **Non-baseball weekday afternoon events would be scheduled to end before 4:00 p.m. Non-baseball weekday evening events would be scheduled to begin at 7:30 p.m. or later.**

Visual quality and lighting effects of non-baseball events are discussed in Visual Quality and Lighting, Field Lighting Effects. Lighting for non-baseball events would be expected to be at levels similar to or less than those needed for baseball activities. Other than for the five maximum-capacity major events, transportation and circulation effects of non-baseball events would be similar to or less than those for baseball events, as discussed on pp. IV.101 - IV.104.

Potential noise levels associated with ballgames and concerts are analyzed and discussed in IV.F. Noise, beginning on p. IV.237 of the EIR. The EIR considered a range of events that could potentially produce noise impacts. These include 1) baseball games, 2) large open-air concert events attended by approximately 50,000 people with no limit on noise levels, and 3) amphitheater music events accommodating approximately 10,000 people in an enclosed portion of the ballpark. The EIR calls for any amplified music events in excess of five to be subject to a maximum sound level limit.

At this point, it is premature to impose special use districts, and such districts are not part of this project. See Project Description, Uses of the Ballpark and Project Description, Type and Number of Events regarding use approvals at the ballpark and provisions of Proposition B.

See the Land Use and Quality of Life sections of this document for discussions of the effects of the project on surrounding neighborhoods.

Service Driveway Access, South Beach Harbor Parking, and South Beach Park

Comments

Figure II.D.2: Please draw a line along the eastern boundary of the ballpark site (the eastern edge of the 2nd Street right-of-way) that was created by Proposition B. The "service drive" to the ballpark garage and loading area is outside that boundary and intrudes onto the space designated by the agency for public open space, but it is impossible to tell that from the rendering or from the related text. The Initial Study at A.5 labeled the area east of the Prop B boundary as a 230 space "Maritime Garage" and a building along the waterfront as "maritime facilities." This rendering labels it "proposed expansion of South Beach Park." That description is disingenuous.

The Agency has been planning a garage and facilities for the marina for that location all the time this EIR was being developed and initiated funding for it yesterday. Those structures are integral to the renderings of this site presented by the Giants architect. That project is to be constructed simultaneously with the ballpark and must be shown on these plans, particularly because the Agency has provided access for the ballpark garage as part of that project. This park expansion is directly tied to construction of the ballpark and is [part] of the cumulative context. Correct the rendering to reflect the plans for construction in this area. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Is the east access driveway part of this project or not? The site plan outline throughout the EIR only shows the ballpark as going to end of 2nd Street right of way. The driveway is to the east of the 2nd Street right of way and outside that boundary. Correct this throughout EIR. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

II.15 - Parking: Access to the parking would be from King Street, east of 2nd Street, but it is through the public park to the east of the ballpark. Correctly explain this. Also, so long as the Agency intends to build a garage under that park the description should state it "also serves as access to parking in a garage for the marina." (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

IV.13 - SFRA plans: This is difficult to understand the Agency's plan to change this area because there is no accompanying map. Please show the existing plan and the change graphically.

The driveway to the east of the Proposition B boundary is an integral part of the ballpark because it provides necessary access to the parking and delivery area. If no garage is constructed under the expanded park -- an alternative which is being requested by the marina tenants -- the boundary of the ballpark would have to be shifted to include that site. Discuss. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

[Page] IV.20: Add the access driveway to the east of the 2nd Street right of way as a use in the public park. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

[Page] IV.31 - South Beach Park The description of the access driveway is, again, wrong. The driveway is not an extension of 2nd Street, but is located east of Second Street in the park property. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The boundaries of the project site, as defined in Proposition B, are clearly shown on Figure III.C.2, p. III.6 of the EIR. The east access, service driveway would be located east and adjacent to the Second Street right of way, as shown in Figure II.D.2, p. II.10. The east access, service driveway shown in Figure II.D.2 would be constructed by the San Francisco Redevelopment Agency (SFRA), to serve its existing and proposed parking, and thus is not part of the project site. Through agreement with the SFRA, the east access service driveway would provide shared access to the ballpark and planned South Beach Harbor parking that is part of the *Rincon Point - South Beach Redevelopment Plan*. Figure III.A.4 in Land Use, Characterization of Land Uses, shows the existing boundaries and land use designations for the *Rincon Point - South Beach Redevelopment Plan*. The SFRA's plans for the *Rincon Point - South Beach Redevelopment Plan* area are discussed in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension.

When the Initial Study was published, SFRA's plans for the area east of the ballpark site included a maritime garage as shown in the Initial Study in Figure 2, p. A.5. During preparation of the EIR and at the time of publication of the Draft EIR, SFRA's plans included

construction of a subsurface garage with a bermed green, public open space above; the labeling of the area on Figure II.D.2, "Planned Expansion of South Beach Park," correctly reflects that design. As noted by the commentor, SFRA has submitted an application to the California Department of Boating and Waterways for funding for the expansion of Harbor-related uses. The design described in its submittal was the bermed park extension over the parking garage scheme that was described in the Draft EIR. Since publication of the Draft EIR, the SFRA has continued to consider other alternatives in its planning process, and is currently considering constructing a 210 - 250 space surface parking lot on the site, which would preclude the planned extension of South Beach Park at this time. See Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension for further discussion of the SFRA planning process for the *Rincon Point - South Beach Redevelopment Plan* area. The transportation-related effects of the surface lot would essentially be the same as those of the bermed structured parking assumed in the cumulative context of the ballpark in the Draft EIR.

The commentor indicates that the proposed expansion of South Beach Park is "directly tied" to the proposed ballpark and amendment to the *Rincon Point - South Beach Redevelopment Plan*. The proposed amendment to the *Rincon Point - South Beach Redevelopment Plan* would expand the boundaries of the South Beach Redevelopment Project in order to accommodate the Giants Ballpark. Most of the ballpark would be sited on the area covered by the proposed amendment to the Redevelopment Plan; however, a portion of the ballpark would be sited on approximately 2 acres of the existing Redevelopment Project area. Port buildings are presently located on this area. A portion of this 2-acre area is currently part of a surface parking lot that serves the ILWU building, South Beach Harbor, and South Beach Park, with an entry on King Street opposite Second Street. The Redevelopment Plan amendment would designate the entire ballpark site, including this 2-acre area, as "Ballpark."

Since the existing King Street entry to the parking lot would be removed, the SFRA intends to construct a replacement vehicular access driveway to the South Beach Park, Harbor, and

ILWU building parking lot. As correctly indicated by the commentor, this driveway is outside of and adjacent to the eastern boundary of the ballpark site (pursuant to Proposition B). The primary function of the driveway is consistent with the uses permitted under the "Major Park" designation on p. 9 of the *Rincon Point - South Beach Redevelopment Plan*, as a use that supports the Harbor and Park. The SFRA has agreed to share this new driveway with the ballpark, in order to better accommodate vehicular flow in the vicinity, facilitate pedestrian accessibility, and minimize the number of driveways onto King Street. As a shared access facility, the driveway would have a secondary function as a service drive to the dedicated ballpark loading and parking area, as shown on Figure II.D.2, p. II.10 and in revised Figure II.D.2, in Project Description, Graphics and Renderings, which has been relabeled to indicate that the access drive would be shared.

The following sentence has been added after the second sentence of the second paragraph on p. II.15:

> **As shown in Figure II.D.2, p. II.10, the shared service drive, located east of the ballpark, would provide access to the loading docks and parking spaces within the ballpark and would also serve as access to existing parking and new parking proposed by the Redevelopment Agency for South Beach Harbor.**

The third sentence of the third paragraph on p. II.15 has been amended:

> **Access to the loading area would be from King Street, via the shared service drive, to be located immediately east of the ballpark.**

The EIR, p. IV.24, discusses the configuration of the joint Second Street right-of-way service drive to access both the ballpark internal parking component and the Redevelopment Agency's proposed underground parking. The following text has been added to the end of the first partial paragraph on p. IV.21:

> **A shared entrance drive to the ballpark's internal parking component, and SFRA parking, would be located immediately to the east of the ballpark.**

Graphics and Renderings

Comments

Missing Rendering: There is nothing that explains clearly the uses at the ground level throughout the ballpark or the ground level circulation pattern. This is a major omission because it is impossible to understand much of the textual references to space in the ballpark as a result. Such renderings [floor plans] are routinely provided in EIRs because they help understand circulation and how the project is "seen" by those using it and passing by. At a bare minimum the ground floor must be rendered, although it would be helpful to have higher "floor" elevations [plans] as well to understand building mass and circulation.

Missing Rendering: Please provide a graphic that shows all queuing areas and their capacity, i.e. where are the "lines" for ticket windows, will call, entry and all other spaces before someone is "inside" and their ticket collected? This should be done for each of the ballpark entrances.

Figures II.D.3 and II.D.4: These figures are not helpful for understanding the uses at the different levels and the scale makes it even harder to understand them. They do not match the rendering shown at the Giants' March 25, 1997 press conference on the ballpark.

Particularly the top drawing is impossible to "read." Label, with arrows if necessary, building and their use floor by floor. The restaurant building under the scoreboard is hard to figure out as a building, particularly its mass.

On both, the difference between a flat screen showing scores and advertising and a deep (restaurant) building is hard to detect.

It would have been more helpful if a cross-sectional rendering (labeling floors and uses) of the main buildings had been provided, just to make it easier to understand the project. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page II.15: A floor plan of the ground floor of the ballpark should be included to indicate the uses on the perimeter of the site, particularly facing the King Street arcade and South Beach Park. (Steven L. Vettel, Residential Properties Group)

Response

A full-sized set of plans for each level and various aspects of the project is available for review at the Planning Department at 1660 Mission Street. Due to the large size of the site and the complexity of the ballpark design and construction, a reduced version of the proposed plans at

a scale that could be reproduced in the EIR would not be legible and would, therefore, have limited utility.

As indicated in Figure II.D.2 in the EIR, the exterior ground floor or service level of the ballpark would include: pedestrian entrances at each corner; sixteen ticket windows along the King Street facade; the shared access drive, loading areas and entrance to the restaurant uses on the east side; the playing field and a wall with arched openings along the waterfront; and, entrances to the Pavilion Building along Third Street.

The interior service level would include shower and locker rooms; offices; storage; dugouts and batting cages; and team facilities. The other levels include the various seating options, concession stands, restrooms and press facilities.

Comment

The elevations, Figures II.D.6 and Figure II.D.7, should have a bold, dashed line representing the elevation profile of the China Basin Building centered on each facade for a fair comparison of bulk. (Joel Ventresca)

Response

Figures II.D.6 and II.D.7 on p. II.24 of the EIR are presented as part of the Project Description and are not meant to be used for analysis purposes. Refer to IV.C. Visual Quality and Lighting, pp. IV.25 - IV.45 for a discussion of the proposed ballpark's visual compatibility with the surrounding area. Figure IV.C.3 on p. IV.33 is a photosimulation view looking at the project to the northeast from Potrero Hill; the view includes the China Basin Building. The China Basin Building is also visible in a closer view in Figure IV.C.1 on p. IV.28, and in a new photosimulation, Figure IV.C.2a, in Visual Quality and Lighting, Views from China Basin Area.

Comment

Fig. II.D.6 and II.D.7, Elevations: Provide east and west elevations as well. (Steven L. Vettel, Residential Properties Group)

Response

See Figures II.D.3 and II.D.4, p. II.17 in the EIR, for these elevations.

Comment

Figure II.D.1: Please label streets. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Figure II.D.1, p. II.9, is an architectural rendering and does not, therefore, contain street names or other text. Streets shown in Figure II.D.1 include Third Street to the right (west) of the project and King Street in front (north) of the project. Refer to the Site Plan, Figure II.D.2, p. II.10, for street names.

Comments

[Figure II.D.2] Include and label the ILWU building and label the Sailing Ship Restaurant.

It is impossible to understand the parking that exists on the marina end of this site on this rendering. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

[Page] II.16 says that there are small retail uses south of the Pavilion adjacent to the plaza. Label them. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Figure II.D.2, p. II.10 of the EIR, shows the then-planned expansion of South Beach Park as proposed by the SFRA. See Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension for a description of SFRA plans for the South Beach Redevelopment Project Area. Existing surface parking for the South Beach Harbor is located adjacent to the landscaped area west of the harbor walkway between the Sailing Ship Restaurant and the east pedestrian entrance.

Figure II.D.2 is intended to emphasize the project characteristics. The ILWU and Sailing Ship Restaurant are indicated where the text makes reference to them. The retail spaces are not labeled because their use would be limited to the duration of events at the ballpark. They are not independent retail uses. Figure II.D.2 has been revised to add labels to the playing field, loading docks, ILWU building, Sailing Ship Restaurant, the shared access drive, and the seawall.

Comment

Page II.8: Provide the dimensions of the site. (Steven L. Vettel, Residential Properties Group)

Response

Figure II.C.2, p. II.6, shows an outline of the project site overlaid on existing uses. As stated on p. A.2 of the EIR, along King Street the project boundary would be about 905 ft., along the east side about 740 ft., along the China Basin about 950 ft., and along Third Street about 420 ft.

Comment

Page II.13: A diagram of the components of the face of the scoreboard should be included, designating the percentage of the scoreboard devoted to baseball functions and the percentage devoted to advertising functions. (Steven L. Vettel, Residential Properties Group)

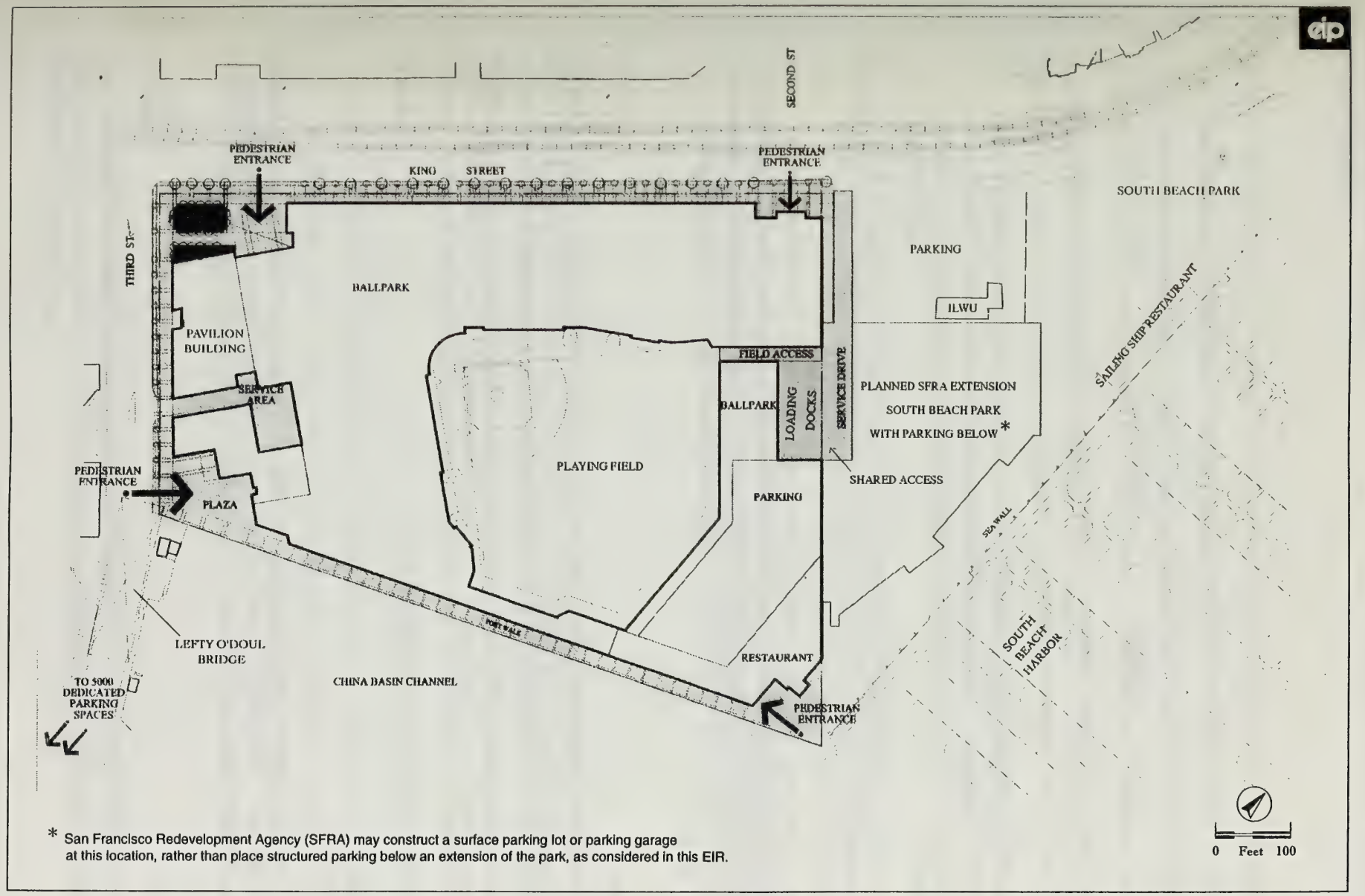
Response

The scoreboard is considered an "exempt sign" pursuant to Planning Code Section 603(g) and final design would not occur until later in the development of construction drawings for project.

<u>General</u>

Comment

Capital improvements to harbor - It is essential that the project include the presently contemplated maritime facility, or something similar. This will be a very important focus and magnet for harbor activity, and will maintain the boating character and amenities necessary for any harbor to survive and thrive. (Doug Gooding, CAC member)



* San Francisco Redevelopment Agency (SFRA) may construct a surface parking lot or parking garage at this location, rather than place structured parking below an extension of the park, as considered in this EIR.

SOURCE: Hellmuth, Obata, & Kassabaum

GIANTS BALLPARK

Figure II.D.2 (Revised) Site Plan for Proposed Project and Adjacent Area

Response

South Beach Park and Harbor improvements are not part of the ballpark project and are addressed in the EIR as part of the future cumulative context. Since publication of the Initial Study (see Appendix A of the EIR), the San Francisco Redevelopment Agency has decided to evaluate other, less expensive alternatives for the park extension and harbor parking. (See Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension.)

Comments

The other item is a personal item. I happen to love that sailing ship out there. I think it is a landmark for our beautiful harbor. So, please, try to save the sailing ship. Move something else. Don't destroy the sailing ship. (Dave Davis)

One other point on a personal basis. If at all possible, please try to Save Our Sailing Ship. I happen to feel that it is a beautiful landmark for a harbor and should be protected. It certainly is much more appropriate than that four legged thing that sits in the middle of the green. (David Davis)

Response

The Sailing Ship Restaurant is located east of the project site. The decision as to whether the Sailing Ship Restaurant is displaced will be made by the SFRA in conjunction with the planning and development of the extension of South Beach Park and associated parking. The SFRA is currently considering the construction of a surface parking lot that would not involve the removal or relocation of the Sailing Ship.

Comment

Pages I.3 and II.8 indicate that "The ballpark's total gross floor area would be about 1,077,000 gross square feet." Table II.D.1 gives the total area as 1,258,000 square feet. These figures are inconsistent and require correction or clarification. (Rincon Point South Beach CAC)

Response

Baseball-related facilities would total 1,077,000 sq. ft. and commercial and Pavilion uses would total 171,000 sq. ft. for a total of 1,248,000 sq. ft.

There is a summation error in Table II.D.1 for total area sq. ft. The last line of Table II.D.1, p. II.12 has been revised to read as follows:

TOTAL AREA	**~~(1,258,000)~~**	**1,248,000**

The last sentence of the second full paragraph on p. I.3 has been revised to read as follows:

> **The ballpark's total gross floor area would be about 1,248,000 gross sq. ft., ~~which includes all enclosed spaces, the concourse and seating bowl~~ including 171,000 gross sq. ft. of commercial/Pavilion Building facilities and 1,077,000 gross sq. ft. of baseball uses.**

The last sentence of the third paragraph on p. II.8 has been revised to read as follows:

> **The ballpark's total gross floor area would be about 1,248,000 gross sq. ft., ~~which includes all enclosed spaces, the concourse and seating bowl~~ including 171,000 gross sq. ft. of commercial/Pavilion Building facilities and 1,077,000 gross sq. ft. of baseball uses.**

Comment

Section V. (B) Mitigation Measures, Transportation and Circulation, discusses ferry service to the project site as a means of reducing impacts to the freeway network and freeway ramp system, yet the ferry component is described in Section VII (A) as a variant to the project. What criteria was used to establish the ferry service as a variant, rather than a project component? (Dave Plummer, Public Land Manager, California State Lands Commission)

Response

Ferry service is analyzed in the EIR both as a mitigation measure and as a project variant pp. IV.41 - IV.42 and pp. VII.1 - VII.9. The analysis is based on a conceptual design prepared by marine engineers hired by the project sponsor. The provision of ferry service is being explored with ferry providers. Details of service and design have not been established to date.

Comment

Page II.22-23: This section describes the ballpark design, not construction. Provide a discussion of the construction time, intensity, number of workers, etc. (Steven L. Vettel, Residential Properties Group)

Response

Refer to pp. IV.228 - IV.230 of the EIR for a description of construction duration, phasing, number of workers, and numbers of construction and workers' vehicles.

Comment

Did someone mention a 24 hour restaurant service within the stadium. If this is so, what about those who dine in the restaurant and find themselves stranded at an hour past CalTrain service? (Mariuccia Iaconi)

Response

As described on p. II.16 of the EIR, the 35,000 sq. ft. centerfield restaurant would be open to the public all year long. Operating hours for the restaurant would be generally day and evening hours, and 24-hour operation is not planned.

The project sponsor is currently contemplating eliminating the centerfield restaurant. If this occurs, concession and restroom spaces would replace the restaurant on the ground floor and main concourse levels. The area behind the centerfield scoreboard on the main concourse would include an outdoor concession area that would be open all year round. The elimination of the restaurant would double the size of the public plaza beyond centerfield.

Comment

Page I.4, last line. Proposed improvements to the existing waterfront walkway surfacing with a "salt" or do you mean "sand" finish? (Also page II.23 line 11 and page IV.31 line 1 paragraph 1.) If in fact "salt-textured," please define or describe. (Rincon Point South Beach CAC)

Response

The proposed waterfront walkway surface is described as a salt or aggregate-like finish. A salt finish refers to the texture of a concrete surface which has been made rough to form a tread surface with more traction.

Comment

In addition, living next to the Bay Bridge, I am especially concerned that a plan for its retrofit take into account the buildings' need to enter and exit from the front and side of the building. The servicing of trash and garbage for the building takes place through the side exits, as well. (Elizabeth Carney)

Response

The project being evaluated in this EIR is a ballpark on King Street, not retrofit of the Bay Bridge. Access to the Clocktower Building where the commentor lives could be affected by Bay Bridge construction on a daily basis during construction, unlike ballpark traffic that would cause congestion before and after events. See further discussion of traffic during Bay Bridge construction in Transportation and Circulation, Traffic Impacts.

Scoreboard

Comment

What is the height of the primary scoreboard?
Page I.4; line 6 "The primary scoreboard is about 125 ft. above the playing field at its highest point."

Page I.12; line 25 "The scoreboard...would rise to about 175 ft." (Rincon Point South Beach CAC)

Response

The primary scoreboard would be about 125 ft. above the playing field at its highest point.

The last sentence of the third paragraph on p. I.12 has been revised as follows:

> **The scoreboard would be about 125 ft. above the playing field and light standards would rise to about 175 ft.**

The project sponsor is currently considering eliminating the centerfield restaurant located at the southeast corner. If implemented, this change would result in the lowering of the centerfield scoreboard about 16 ft. and moving the centerfield scoreboard forward about 50 ft. See Section A, Introduction.

Comment

Alternatives to a single scoreboard (two scoreboards) and a scoreboard of reduced size should be shown and analyzed with respect to visibility from points outside of the ballpark... (Martin Fay, Rincon Point - South Beach CAC)

Response

No significant adverse environmental impacts would result from the scoreboard design or placement, pp. IV.34 - IV.44 of the EIR. Thus, alternatives to the scoreboard design are not necessary.

Lighting

Comment

Page II.14: The description of the project lighting is inadequate. Specify the number of sports lighting fixtures (600 fixtures), their wattage, beam control, shielding, etc. Is there a major league baseball minimum standard for lighting levels on the playing field? Also describe the interior lighting system in addition to the sports lighting fixtures and the exterior lighting system.

What are the hours during which the sports lighting system would be illuminated? How long after the conclusion of an evening game would these lights be turned off? (Steven L. Vettel, Residential Properties Group)

Response

Project lighting is referenced in the project description, and is explained in detail in the lighting discussion on pp. IV.25 - IV.45 of the EIR. Major League Baseball standards require that outfield lighting for new fields be lit to a 250-foot-candle standard in the infield and to a 200-foot-candle standard in the outfield to ensure adequate lighting for players, fans, and television broadcast.

Each of the two outfield light standards is expected to contain about 90 2,000-watt fixtures. The two midfield and two infield light standards placed atop the ballpark canopy are each expected to contain approximately 115 2000-watt fixtures. The lighting includes internally

shielded glare control devices. The ballpark will also include approximately 90 400-watt high pressure sodium lamps for interior house lighting which should provide enough lighting for maintenance purposes. It is expected that all lighting except for the interior house lights can be turned off when patrons have exited the ballpark, generally approximately one hour after the end of a game or other event.

South of Channel Parking

Comments

The DEIR is inadequate, as it is based upon an overly narrow project description, which excludes the 40 acre parking located immediately south of China Basin Channel.

An EIR must be based on an accurate and complete project description in order to identify and analyze all significant impacts of the project. *San Joaquin Raptor* (1994) 27 Cal.App.4th 713,730. The 40 acre South of the Channel parking area is an integral part of the Ballpark project, included in DEIR drawings and early narrative descriptions (p.I.4-5;Figs.II.D2, II.D.5). Construction and operation of the parking area will have significant impacts on the Bay and its aquatic and bird life. The DEIR's project description ("adjacent to San Francisco bay and bordered by King Street, Second Street, China Basin Channel and Third Street," (p.I.2;Fig.II.C1)) excludes both the physical structure of the South of the Channel parking area and of the activity of 5,000 cars parking in this area. This overly narrow definition casts the highly contaminated South of the Channel parking area outside the scope of the DEIR. The DEIR is inadequate for failing to analyze the environmental impacts on San Francisco Bay and its aquatic and bird life of the *entire* Ballpark project. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

I would like to make the point that when the initiative for the ballpark was approved by the voters of San Francisco, that was for a 13 acre ballpark, not 40 acres of parking...It was put forth when the initiative was up for vote that this was going to be a public transit ballpark. That was the big push. It is not going to be a public transit ballpark if there is no mention made in the draft EIR of accommodations for public transit of shuttle buses, of parking spaces, additional parking spaces, and outlying areas where public transit can occur. (Jo Podvin)

Response

The text of Proposition B contains references to the provision of 5,000 parking spaces in close proximity to the ballpark. Proposition B added Section 249.18 to the planning code containing reference to the provision of 5,000 parking spaces. The South of Channel parking areas as a

component of the project are described on the EIR on p. II.19. The following text has been added to the end of the second paragraph on p. II.8.

> **Additionally, there would be surface parking areas south of China Basin Channel consisting of approximately 5,000 spaces. This would be parking dedicated for ballpark use. This surface parking would be replaced by structured parking, as required, by the year 2015.**

Further discussion of the effects of the proposed South of Channel parking site regarding litter control is in Water Quality and Aquatic Ecology, Litter in the Channel and Bay; sewage and storm water runoff containment is in Water Quality and Aquatic Ecology, Parking Lot Runoff; impact of lights on surrounding neighborhoods is in Visual Quality and Lighting, Lighting Effects - Parking Areas; security is in Initial Study, Security of the Neighborhood; satellite parking and shuttles, in Transportation and Circulation, Parking, *Satellite Parking*; and in Variants to the Proposed Project, Increased Dedicated Parking Variant, second response.

Comment

We have added three times the area to the initial approval for the ballpark in parking. We are talking about 40 acres of parking, 5,000 or more parking places. To take the mandate of the voters that their wishes include the parking is a travesty. It is a mockery of the initiative process... The mandate is for the ballpark. It is not for 40 additional acres of parking. And to take the mandate as such is really a mockery of the initiative process. (Jo Podvin)

Response

Proposition B specifically referenced 5,000 parking spaces which would be available for ballpark use (Planning Code Section 249.18(b)(3)). Depending on the parking lot layout, each parking space requires 300 to 400 square feet; 40 acres is not an unusually large area for 5,000 parking spaces.

Comments

Page II.21, Dedicated parking: Is there is a lease commitment between the Giants and Catellus for the interim parking? For how long is that commitment? What commitments have been made by Catellus or others regarding permanent structured parking to replace the interim surface parking? Would a permanent parking structure be located south of the channel? If so,

is that consistent with the Mission Bay Plan and zoning, or would modifications to the plan and zoning be necessary? (Steven L. Vettel, Residential Properties Group)

Page IV.201, Permanent parking: What commitments has Catellus made to allow permanent parking to be developed in Mission Bay South? Is a requirement to develop such permanent parking an agreed upon condition of the project? If it is not, the EIR must indicate that there could be no dedicated parking after 2015 and then re-analyze the parking impacts of that scenario. (Steven L. Vettel, Residential Properties Group)

Page IV.23, Parking: What arrangements have been made with Catellus to allow permanent structured parking to be development by 2015? What commitments have the Giants made to develop? (Steven L. Vettel, Residential Properties Group)

Immediately suspect are all the underlying assumptions used in the models and simulations that support this study. I see nothing to indicate that the Port has any firm agreement with Catellus for interim parking (through 2015) and absolutely no plan for parking beyond 2015. Look at the leverage that Catellus has against the City! Who do you think is going to end up paying an arm and a leg for the stadium parking? (Silva B. Creg)

Response

Proposition B granted an exemption from the parking requirement of Section 151 of the planning code in recognition of, among other things, at least 5,000 available parking spaces near the ballpark. As part of the approval process, decisionmakers will consider whether to require any dedicated ballpark parking.

The EIR analyzes interim parking in the area at the present time. The EIR assumes land for structured parking would be available to accommodate Giants parking in the future, so that long-term cumulative analysis incorporates that assumption in the parking analysis. Finally, the EIR suggests activities that would help to limit parking shortfalls without developing additional parking facilities, see pp. IV.214 - IV.215.

Parking uses are specifically authorized by the Mission Bay zoning as interim uses for a period of up to 10 years. It is anticipated that changes to the Mission Bay Plan will be proposed and implemented to provide either for continuation of parking uses or other uses. As of this writing, no leases have been signed between the project sponsor and Catellus or the Port,

although negotiations are well underway. The transportation analysis in Chapter IV of the EIR for year 2015 is based on the assumption that structured parking would be available by 2015 south of the Channel to serve the ballpark.

The No Dedicated Parking Variant, discussed on pp. VII.9 - VII.16, analyzes the impacts that could occur by the year 2015 if no vacant land is available in Mission Bay or on nearby Port property, or the parking lots have been redeveloped, or all parking provided is allocated to Mission Bay and Port use only. The financial arrangements between the project sponsor and Catellus Development Corporation are not physical environmental issues and analysis of them is beyond the scope of the EIR.

Comment

[Is] the proposal to use this lot only for stadium events, or will it become a parking lot for downtown commuters on non-game days? (San Francisco Tomorrow Waterfront Committee)

Response

As stated in the EIR on p. II.19, the project sponsor intends to provide dedicated parking for games and other events at the ballpark. The parking areas are not assumed to be available for daily commuter parking.

Public Access

Comment

A Public Promenade. The Attorney General's office has advised the Commission that proposed development upon a pier that does not involve any additional coverage of Bay waters and that does not involve any work on the pier itself or its substructure may be treated as work within the Commission's shoreline band jurisdiction. However, complete removal and replacement of a pier structure must be evaluated as fill in the Commission's "Bay" jurisdiction. The Draft EIR does not contain details as to the precise location of the existing seawall, nor does it describe how the deck supporting the proposed public access promenade along China Basin Channel would be constructed; that is, whether the existing deck can be used to support the promenade or whether the deck must be razed and rebuilt. Thus, the amount of fill needed to construct the public promenade would depend on how much of the

existing deck would be incorporated into the proposed promenade. The Commission can authorize minor fill for public access purposes and the Commission staff and Design Review Board have both encouraged the applicant to widen the promenade to 25 feet (from its proposed 22-foot width), and to provide several small plazas extending bayward of the promenade to enhance the public access experience along the promenade and provide areas for waterfront users to avoid the press of game-day crowds....

The Commission's law requires that projects authorized by the Commission provide "the maximum feasible public access consistent with the project." In the past, the Commission has found that pedestrian/bike paths with park amenities (e.g., benches, trash containers, lighting, etc.) through a landscaped corridor along the shoreline that is sufficiently wide to buffer potentially competing uses meets the public access requirements of the McAteer-Petris Act. As proposed, the project would provide a 22-foot-wide waterfront promenade along China Basin Channel and would connect to the walkway along South Beach Harbor by a 1,500-square-foot pile-supported concrete pier. The public access would be immediately adjacent to an approximately 24-foot-high arcade that would run for 640 feet along the Channel. The Commission staff has suggested the following modifications to the proposed public access to assure its consistency with the public provisions of the McAteer-Petris Act:

1. Port Walk (promenade). As stated above, the staff believes the promenade should be widened to 25 feet and include between six to eight small plazas extending bayward of the promenade. A wider promenade is warranted because we expect it to be heavily used during game and event days. The increased width and small plazas should help reduce potential conflicts between stadium patrons and joggers and pedestrians using the waterfront promenade. We are also concerned that the promenade may be used for queuing ferry passengers (page IV.31 of DEIR) and believe that such queuing should be accommodated elsewhere if possible, for example, by creating a small plaza just inland of the promenade. Finally, careful attention should be paid to such details as railing design and height, bench design and orientation, lighting, etc., to promote user enjoyment of the Bay.

2. Access to Second-Story of Stadium. In discussions with the applicant, the applicant has indicated that as part of access to the restaurant in centerfield and/or as part of the centerfield entrance to the ballpark, the public would be afforded the opportunity to have views of the Bay from the second story of the stadium. Such access, although possibly restricted during events, would also be designed to allow views into the ballpark. We have strongly supported this proposal and would like the final EIR to include an exhibit and brief description of this important public access amenity.

3. Parking South of China Basin Channel. At least one of the "interim" parking areas south of China Basin Channel appears to be within 100 feet of the Channel and thus would be within the Commission's shoreline band jurisdiction. We believe that public access must be provided along the channel for this portion of the project to be consistent with the public access requirements of the Commission's law. Such public access should be designed as a pedestrian

corridor from the parking lots to the ballpark and to provide public access along the affected shorelines. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

Revised Figure II.D.2, in Project Description, Graphics and Renderings, shows the seawall to the west of South Beach Harbor.

The Port Walk along China Basin Channel to the south of the ballpark would be about 22 feet wide. The existing deck of the Port Walk would not be removed, and no fill would be required for the Port Walk. The Port Walk runs above the steel bulkhead. Minimal fill proposed for the project would be limited to that required for public access improvements along the shoreline.

As described on p. II.25 of the EIR, the ballpark's new mat foundation would be pile supported. All piles for the foundation would be placed behind the steel bulkhead on the landward side. Bulkhead repairs would not require pile driving (see EIR pp. IV.314 - IV.315).

As described on pp. IV.319 - IV.320 of the EIR, the project would require some pile driving for the concrete connector between the seawall and the steel bulkhead; this connection would allow pedestrian access from South Beach Park and the seawall to the Port Walk.

Vertical guide piles would be required for ferry berthing facilities in China Basin; see Figure VII.A.1, p. VII.2, should this variant be constructed.

With respect to public access, the project sponsor is considering increasing public access along the waterfront, including substantial enlargement of the plaza behind the centerfield area. The project sponsor is also considering replacing the proposed restaurant with a plaza including an outdoor cafe. If constructed, the plaza would be restricted to ballpark patrons on game days and during certain special events but otherwise would remain publicly accessible on a year-round basis.

The commentor's suggestions regarding design of the ballpark amenities are noted. Additional detail regarding design, as well as the public access components, of the project will be addressed by the project sponsor as part of the BCDC permit process.

The commentor's suggestion regarding public access along the shoreline of the parking south of China Basin Channel is noted. The public access for the project as a whole, including the parking, will be addressed as part of the BCDC permit process. Figure II.D.5, p. II.20, shows proposed South of Channel parking areas.

Fill

Comment

Of potential concern is whether any part of the ballpark would be located on fill in San Francisco Bay. The final EIR should include both an exhibit and narrative description of how much, if any, of the ballpark would extend bayward of the seawall. If fill is needed for the ballpark itself questions would arise as to whether the ballpark is a use for which fill can be authorized. For this reason, it is important to determine early whether any portion of the ballpark involves "Bay" fill. One obvious way of assuring the project's consistency with the use provisions of the McAteer-Petris Act is to limit uses on fill to public access, a use for which some fill can be authorized. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

The ballpark, itself, does not extend bayward of the seawall and would not involve any new fill. As described in the EIR, p. II.30 and pp. III.20 - III.22, project "fill", as defined in the McAteer-Petris Act and BCDC plans and regulations, is limited to minimal fill required for public access improvements along the shoreline. Detailed information will be submitted to BCDC as part of the permit approval process.

Approvals

Comments

I am writing in response to the Draft Environmental Impact Report for the Giants Stadium. It is absolutely incomplete and inaccurate in many of its details. The Giants have publicly stated that the report held no surprises. For myself and citizens concerned about the future of San Francisco there were also no surprises. Of the 12 objectives stated by the Giants in the beginning of the report, not one mentioned how this project would affect the people of San Francisco. Not one was concerned with how this project would change the quality of life for the thousands of people who live and work in this area. It was painfully obvious that the Giants are only concerned about their fans-70% who come from outside this city- and their ticket sales. There are several buried bombs in this report that can get lost in all of the wording and jargon. I will mention just a few that you should think of in personal terms not just more bland facts. (Nancy Anding)

[T]he Giants have formed a multimillion dollar corporation just to develop the stadium. And they listed 15 or 20 of their main objectives. And not a single one addressed the quality of life of the people who live in San Francisco. (Nancy Anding)

Response

The purpose of the EIR is to disclose potential physical impacts of the project and to identify mitigations and alternatives. If and when discretionary approvals are granted for the project, there are procedures that require the public decision-making bodies to identify the public objectives that could be achieved through project approval. These procedures include, but are not limited to: "Proposition M" findings under Section 101.1 of the Planning Code for approval of the conditional use, building permit, and general plan amendment. This requires that the project be found consistent with the eight Priority Policies contained in Section 101.1 which promote, among other things, that neighborhood character be conserved and protected.

In addition, each approving agency would have to make appropriate findings under CEQA. If the project, as approved, would have unmitigated significant impacts, this finding would be required to include a statement of overriding considerations. This is a statement explaining why "the benefits of the project outweigh the unavoidable adverse environmental effects ...." (CEQA Guidelines Section 15093).

Finally, it must be noted that San Francisco voters approved Proposition B, which states that it is the policy of the people to construct, develop, and operate a new ballpark at China Basin subject to certain conditions that would be met by the current proposal. The final determination as to whether the project warrants approval would be made by decision-makers, acting on behalf of the public, following public hearings before a number of public agencies including the City Planning Commission, San Francisco Redevelopment Agency, San Francisco Port Commission, and Board of Supervisors. Other agencies, including the Bay Conservation and Development Commission and the State Lands Commission, also would have to approve the project.

Comment

Many of the changes proposed to be made in the language of the General Plan are unnecessarily detailed and often entirely project-serving. If implemented as outlined in the DEIR, the changes would lead to a degradation of the entire General Plan process, by which the City requires that project conform to the General Plan, not vice versa. Changing the plan to conform to the project is contrary both to the spirit and the intention of State law governing General Plans. (San Francisco Tomorrow Waterfront Committee)

Response

The voters passed Proposition B as a zoning ordinance. Section 8 of Proposition B directed the City to amend its General Plan to conform to the zoning changes effected by Proposition B. Given the terms of this initiative ordinance, this process of amending the General Plan to conform to a zoning ordinance/project is not unusual. The language of the General Plan should set forth policies and objectives and permissible uses that conform to the project approved by the voters. The Amendments to the General Plan have been revised. The text of the EIR has been changed to reflect those revisions.

Comment

I think it is unacceptable, however, that in the EIR there was no appendix identifying where the problems may be. I think that is something that can be and should be included as you get toward the final draft. (Jim Firth)

Response

The commentor requests that the EIR provide an appendix or summary of the project impacts. The Summary Chapter of the EIR, pp. I.1 - I.57, summarizes the project description pp. I.1 - I.8, main environmental effects on pp. I.8 - I.46, mitigation measures on pp. I.47 - I.55, the variants on pp. I.55 - I.56, the alternatives on pp. I.56 - I.57 and areas of controversy on p. I.57.

Decision-makers for this project would develop the conditions of approval and make appropriate findings under CEQA. Development of the conditions of approval would be based on the mitigation measures, variants, and/or alternatives described in the EIR. If the project, as approved, would have unmitigated significant impacts, this finding would be required to include a statement of overriding considerations. This is a statement explaining why "the benefits of the project outweigh the unavoidable adverse environmental effects...." (CEQA Guidelines Section 15093).

Comment

There is a reference on page III.23 of the draft EIR for this project indicating the need for review by the Army Corps of Engineers where the project involves construction work in the water of San Francisco Bay. The Army Corps is a federal body and any permit it issues is a federal permit. The need for a federal permit for the project initiates Section 106 of the National Historic Preservation Act, in addition to the California Environmental Quality Act, as the enabling legislation with respect to potential archaeological resources. (Jack McIlroy, Staff Historical Archaeologist, Anthropological Studies Center)

Response

The commentor is correct that the limited construction work proposed in the water will require a federal permit from the Army Corps of Engineers. The Army Corps will determine the scope of applicability of Section 106 of the National Historic Preservation Act.

Comment

Page II.29, also Page I.6, regarding Zoning Administrator with respect to interim parking. Add further amplification stating that the Board of Supervisors could also achieve this through

legislative action through amendment of the Mission Bay Special Use District. (Rincon Point South Beach CAC)

Response

The commentor is correct. However, under existing code provisions, the Zoning Administrator must approve the interim use.

Comment

Office and apartment developers have to pay significantly into the funds to support affordable housing, public art, public transit, day care, etc. Any responsibility on Giants part here? (Michael Karasik, Bayside Village Associates)

Response

Pursuant to the Community Redevelopment Law, 20 percent of the tax increment generated by the project would be set aside for affordable housing. Aside from this, under normal City procedures, office development projects in excess of 25,000 net new sq. ft. of office use must pay an affordable housing fee (Planning Code Sections 313-313.14). Also under normal City procedures, office and/or hotel development projects in excess of 50,000 net new sq. ft. must pay a child care fee (Planning Code Sections 314-314.8). Additionally, any office development in the Downtown Area, as defined in San Francisco Administrative Code Section 38.1(d), must pay a transit impact development fee. Further, office development projects located in the C-3 zoning district and proposing more than 25,000 square ft. of net new office use must provide works of art costing an amount equal to 1 percent of the construction cost for artwork on site, or in public spaces approved by the City.

Although these fees do not generally apply to office development in Redevelopment Areas, the SFRA and the Board of Supervisors could require the SFRA to include the fee requirements for the Giants Ballpark office space in its agreements with the Giants, if the amount of office space exceeds the minimum amounts.

Comment

Page I.3 last paragraph. By placing seating in the field, the ballpark's capacity for large special events could exceed 50,000 people; such events would be likely to occur up to five times per year.

Under the terms of Proposition B, which limits the capacity of the ballpark to 45,000, wouldn't this require amendment of the legislation by the Board of Supervisors? (San Francisco Tomorrow Waterfront Committee)

Response

Proposition B created the Northeast China Basin Special Use District and established standards for the development of a ballpark. Section 249.[18] of the Planning Code states the following: "An open air ballpark with a maximum seating capacity of 45,000...shall be permitted as conditional uses." This language does not preclude occasional use of temporary seating for special events. The determination as to whether or not additional temporary seating is permitted would be within the purview of the decision-makers.

Comment

The Port of San Francisco will be asking the SLC to perform a review and give approval of any lease associated with the ballpark project pursuant to Public Resources Code Sections 6701, et. seq. The SLC will assess this project in the context of other surrounding uses of Burton Act land.

Additionally as part of its review, the SLC will assess the adequacy of the rent provided for in the lease and will review the lease and supporting documents when they become available to staff. (Dave Plummer, Public Land Manager, California State Lands Commission)

Response

As stated in the EIR, p. II.30, the State Lands Commission would be requested to review and approve the ground lease. The following sentence has been added to the last paragraph on p. II.30:

> **The State Lands Commission would assess the project in the context of other surrounding uses of Burton Act land and assess the adequacy of the rent provided for in the lease.**

Comment

The Commission has "Bay" jurisdiction at this site in tidal areas up to Mean High Water and "shoreline band" jurisdiction over lands 100 feet inland of the Bay. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

The commentor is correct. BCDC "Bay" jurisdiction is discussed on EIR p. II.30, p. III.2, and pp. III.20 - III.21. The second sentence of the BCDC paragraph on p. II.30 has been amended as follows:

> **BCDC has "Bay" jurisdiction at this site in tidal areas up to Mean High Water and "shoreline band" jurisdiction over lands 100 feet inland of the Bay.**

The first two sentences of the BCDC paragraph on p. III.20 has been deleted and replaced with the following:

> **BCDC has "Bay" jurisdiction at this site in tidal areas up to Mean High Water and "shoreline band" jurisdiction over lands 100 feet inland of the Bay.**

Comment

I have, in the past, recommended that the redevelopment district be expanded, that South Beach be expanded by number of blocks to help administer and pay for this [transportation mitigation]. This is something which the Giants asked to be put in the deep freeze for fear that it would delay their process. But I think it is now time to bring it out of the deep freeze and put it on the table. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

The commentor indicates that the South Beach sub-area of the *Rincon Point - South Beach Redevelopment Project* be expanded by a number of blocks to "help administer and pay for" part of the Giants project mitigations. An economic analysis detailing the mechanism for funding of the Giants project is not part of an environmental impact analysis.

Consideration of additional City blocks is not part of the proposed project and would require completion of a formal redevelopment plan amendment process, including but not limited to,

the designation of such land as a Redevelopment Survey area by the Board of Supervisors, the formation of a planning nexus between the additional blocks and the Redevelopment Project area, the documentation of blighting conditions on the blocks, and adoption of an amendment to the *Rincon Point - South Beach Redevelopment Plan* by the Board.

The proposed amendment to the *Rincon Point - South Beach Redevelopment Plan,* as described on pp. II.7 - II.8, would add land area to the South Beach sub-area to the extent necessary to accommodate the ballpark, designate the ballpark site as "ballpark" land use, and create standards and guidelines for ballpark development. The land to be added as the Redevelopment Plan amendment area is that land described in Proposition B (approved by San Francisco voters on March 26, 1996) as the Northeast China Basin Special Use District, bounded by King Street Second Street, China Basin Channel, and Third Street. This land area is characterized by conditions of blight, including vacant and underutilized land, substandard building conditions, and substantially decreased economic capacity. Development of the land for the ballpark would remove the blighting conditions and allow economically viable uses consistent with the objectives listed on page 6 of the Redevelopment Plan.

Comment

Page II.28, line 28, also Page I. 5, line 28, correction - certification of EIR - not certification of Draft EIR. (Rincon Point South Beach CAC)

Response

The commentor is correct in pointing out that the Redevelopment Agency Commission and the Planning Commission would certify the EIR, which includes the Responses to Comments. The first sentence of the last paragraph on p. I.5 is revised as follows:

> **The following specific actions would need to be taken by the Redevelopment Agency Commission: joint certification of the ~~Draft~~ EIR with City Planning Commission; CEQA findings; adoption of Redevelopment Plan amendment; and authorization of Owner Participation Agreement.**

The first sentence of the last paragraph on p. II.28 is revised as follows:

> **The following specific actions would need to be taken by the Redevelopment Agency Commission: joint certification of the ~~Draft~~ EIR with City Planning Commission; CEQA findings; adoption of Redevelopment Plan amendment; and authorization of Owner Participation Agreement.**

Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension

Comments

It is illogical to plan the project as it is now, which relies on moving parking for the harbor into an underground garage, to reconfigure the park and so forth without having done a complete study plan of that project. I think the Redevelopment Agency and the commissioners really should instruct staff, both Planning Commission and Redevelopment, to come up with a plan and put some numbers next to it and do an EIR for relocation of harbor parking, for the reconfiguration of the park, et cetera, et cetera, instead of just going down a path blithely saying, well, we are going to have a shared driveway with the Giants stadium and we are going to reconfigure a parking garage. (L. Joseph Boss)

The description of the proposed open space in the Redevelopment Plan is grossly insufficient. The South Beach waterfront park is the major public open space -- for the public as well as nearby residents -- in South Beach. It is a major public amenity which will be altered by the proposed alteration of the park -- an alteration which is not described.

Because of the siting of the ballpark, the Agency is altering the proposed expansion of the South Beach park and "mounding" part of the expansion area over a parking garage. That 242 space garage is not included in the EIR.

Up until this revision, the plan for the expansion of this park was for a large relatively flat green open space similar to the Marina Green. San Francisco has repeatedly fought off proposals to install garages under its parks because of the bad experience with such "mounded" parks in Union Square. The large green park at this site has now been converted into a mounded extension of the ballpark with the driveway for the ballpark garage included on the "park" space. The EIR description, "the parking structure [in the South Beach park] would share an entrance from King Street at Second Street with the ballpark's internal parking component," is extraordinarily misleading. See above Kaplan description.

But for the construction of the 242 space garage under the South Beach park there would be no driveway giving access to the ballpark garage because the ballpark is built right up to the Proposition B line, with no provision for a driveway into the ballpark on the ballpark's own

property. The next sentence, that sharing a driveway allows for more parking in the garage for the marina is also grossly misleading. What should be stated is that by shifting the driveway onto the public park the ballpark has maximized its space by "borrowing" from the public park.

There really must be a map that sets out the existing area for the park and the proposed change. (Sue C. Hestor, Advocates for South Beach Harbor)

I would like to thank in advance for the Giants for bringing their photos. This is one of the problems with the EIR. It does not really explain the project. The best explanation was in a newspaper article where the Giants' PR in architecture put out what this project is. This part of the project here is not in the EIR. I thought I was being very dense and stupid because I could not understand why I couldn't find the parking garage for the marina in the alterations to the park.

The reason why I couldn't find it is it does not exist. This is a mound. This green swath east of the ballpark, between the ballpark and the marina is a reconfiguration of the open space in South Beach, and this building, which is not in the EIR at all, is support facilities for the marina, and, we think, a sports bar. So, you have a project description and a project analysis that ends right here.

But the agency is doing a lot more than that, and they have plans for that, and it needs to be in the EIR.

One of the things that I read today was the toxic and soils report. There are major, major problems, and I have lots of faith that the Giants can control the problems of air borne toxics from the soils and from the water that is on the site. However, that is only part of what is going to be excavated. Because the agency has bifurcated this project into two parts.

The second part is the changes to the east of the ballpark. The agency does not have the same level of confidence from me, that they can excavate and do the same intensive, expensive soils mitigation for their garage. Either the garage for the marina is in this EIR and the park modifications are in the EIR, or the agency is going to have to abandon that garage because what you are looking at is two phases of construction with two phases of noise impacts, two phases of toxics removal impacts. Did you know that? It is not in the EIR. (Sue Hestor)

You need to add all of those issues, and the agency needs to give up the fantasy of that parking garage under the park, or put it in here. (Sue Hestor)

Response

The result of ballpark construction, if nothing else were to be done east of the ballpark site, would be the construction of the replacement driveway and the loss of fewer than 30 spaces to

the west of the ILWU building. The remainder of the park and harbor parking area, as well as the existing South Beach Park, would not be affected by the above actions.

Independent of the ballpark project, SFRA efforts to expand South Beach Park, including the enhancement of harbor and park related uses and the provision of additional parking spaces for the Park, Harbor, and ILWU building has been ongoing for some time. The South Beach Park Master Plan, prepared by Robert La Rocca & Associates in 1992, was an implementation scheme for that portion of the South Beach sub-area designated in the *Rincon Point - South Beach Redevelopment Plan* as "Major Park." Construction of the existing South Beach Park and parking lot, the first phase of the Park Master Plan, was completed in 1996. The second phase was to consist of an expansion of the park towards the south and the construction of about 150 new parking spaces to replace the approximately 130 spaces which would be removed to accommodate the park extension. However, the Agency's ability to expand the park has always been limited by a provision in the Agency's lease with the Port, which provides for reconfiguration of the park in the event that the 2 acres within the project site are required for ballpark use. With the advent of the ballpark, therefore, the SFRA began to explore alternatives for extension of South Beach Park. Although the park extension could have been delayed until after completion of the ballpark, the SFRA decided to phase its park and parking construction activities concurrent with those of the ballpark to the extent possible, in order to minimize overall construction and traffic disruption in the vicinity.

One of the alternatives for extension of South Beach Park that was under consideration by the SFRA included the construction of an approximately 230-space Maritime Garage adjacent to the ballpark site, as shown in Vol. II, Figure 2, p. A.5 in the Initial Study. At that time, the SFRA was also considering the construction of new maritime facilities to augment existing harbor and park related uses (also shown on p.A.5 of the Initial Study).

Since publication of the Initial Study, alternatives the SFRA has considered have included: 1) the above-mentioned construction of the two-level parking garage with expansion of South

Beach Park towards the south; 2) expansion of the park towards the south, construction of a 50-space surface parking lot adjacent to the ballpark, and construction of a 350- to 400-space three-level parking garage on Pier 40; 3) the construction of a 210- to 250-space surface parking lot to the south of South Beach Park; and 4) the berming and expansion of South Beach Park over a 210- to 250-space parking garage. The last scenario listed was discussed in the EIR and is shown as "Planned Expansion of South Beach Park" on Figure II.D.2, p. II.10 and described briefly on p. III.29.

Since publication of the Draft EIR, however, the SFRA is considering a less expensive alternative and is currently designing a 210- to 250-space surface parking lot south of South Beach Park (Scenario 3, above). The cumulative transportation-related effects of this surface parking lot in combination with the ballpark would be essentially the same as those reviewed for the bermed garage analyzed in the Draft EIR. Construction of new maritime facilities, although under consideration by the Agency at the time of publication of the Initial Study, was not analyzed as a nearby project in the Draft EIR and is not a part of the surface-parking alternative currently under consideration by the SFRA.

Comment

This project involves an amendment to the Redevelopment Plan for Rincon Point-South Beach and not just the construction of a ballpark. The intertwined nature of the project is evident from the construction of the driveway for the ballpark outside of the Proposition B boundaries of the ballpark (i.e. east of the Second Street right-of-way) in the area of the public park expansion.

One of the main aspects of this project is the restructuring of the planned public park along the waterfront. Instead of setting out the full project, the Agency has illegally separated it into two projects -- the ballpark and the park improvements with related garage and building -- and is pretending that the ballpark can occur without the reconfiguration of the park and related construction. With minor exceptions the changes in the park, including construction of the garage and building, have been omitted from the analysis in the EIR. This is particularly disingenuous because the EIR includes some of the description of the expanded waterfront park, but then omits nearly all discussion of negative impacts of that project. This severing of the project into two parts violates CEQA because the two projects are totally intertwined and according to the Agency will be constructed simultaneously. They must be analyzed together in the EIR, at the very least in a cumulative development context.

In a March 20, 1997 letter to South Beach Harbor boaters and harbor tenants, Michael Kaplan, the Senior Project manager for the ballpark, stated that since March 1996 the Giants, along with their architect, and the Agency have been working to develop plans for expansion of the South Beach park and the South Beach Harbor related facilities. In other words planning of these facilities has been occurring simultaneously with the development of the EIR and was begun 7 months before the Initial Study was released.

That these projects are closely related and the ballpark dependent on development of these park "improvements" is explicit in his letter:

> The proposed Ballpark occupies property extending to the north side [east side] of Second Street in an area formerly proposed to be incorporated into the second phase of South Beach Park which provided some 200 harbor parking spaces. In order not to lose required harbor parking or reduce the size of the park, it is proposed to modify the master plan for South Beach Park expansion. A slightly depressed parking structure accommodating some 242 harbor parking spaces is proposed to be built adjacent to the north wall of the ballpark. The garage will also provide the access to the Ballpark parking and service facilities. South Beach park will be expanded over the roof of the garage sloping from its existing waterfront promenade level to a fifteen foot height along the north [east] wall of the Ballpark. The net result of this modification is an increase in harbor parking from 200 to 242 spaces and an increase in usable park open space from 250,000 to 277,000 square feet.
>
> In addition it is proposed to build an approximately 10,000 square foot two level maritime building as part of the parking garage and along the harbor waterfront. The waterfront level will accommodate 1) the harbor masters office and boaters day room with lockers and showers, 2) public toilets, 3) some 3,200 square feet of maritime serving commercial uses, 4) harbor storage and maintenance space and 5) a waterfront cafe. The upper park level will accommodate a 3,000 square foot community boating center which will include space for the South Beach Yacht Club and a community room which can be used by the Yacht club for expanded needs or for public/community events. It is also proposed that some maritime commercial uses be located on Pier 40 as part of any <u>future commercial development of that Pier.</u>

Thus it is clear that the ballpark is dependent on the proposed expansion for access to its own garage. It is also very clear from comments by Kaplan that the "future commercial development" of Pier 40 is contemplated to be a hotel.

Therefore so long as the Agency holds to the plans to develop that site in the manner contemplated, it is an integral part of the ballpark context and must be fully analyzed in <u>this</u> EIR. It is a violation of CEQA to have chopped up this project up so that information on the impacts of development of the garage for the marina and the building for the harbor related faculties along with their impacts, are omitted from the EIR.

If the Agency intends to proceed with that garage and building, this EIR must be amended in every aspect to include information on the impacts of those projects.

In addition, the garage under the park is being "driven" by the Agency's plan to add a hotel at Pier 40 -- in contradiction to the vote of the people of San Francisco eliminating waterfront hotels. That site could be used legally for marina parking and for harbor support facilities. Instead, as is apparent from published comments, the Agency is pressing for an underground garage next to the ballpark -- one which [would] be much less attractive to the boat owners -- because the Agency plans to rent [the] space to the ballpark when it is not "needed" by boaters in the marina.

If the full impacts of the proposed garage and harbor building cannot be set out so that they meet the schedule for this EIR, they should be abandoned.

As is set out below, my clients are requesting an analysis of an alternative which omits the garage under the park expansion and provides their parking on Pier 40. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

Several environmental documents have been prepared with regard to the *Rincon Point - South Beach Redevelopment Plan Area*. Implementation of SFRA projects in this Redevelopment Area would need to be assessed in light of these documents and are beyond the scope of the ballpark project. No application for development of a hotel on Pier 40 has been submitted, nor is the SFRA undertaking such a project at this time.

Comment

IV.225 The access to the ballpark service area is from the driveway under the park expansion. This again is misdescribed and shows why the full impacts of the realignment and build out of the park expansion should be included in this EIR.

IV.226 - Table IV.E.40 Are the proposed uses in the South Beach park expansion factored into this table and related analyses? (Sue C. Hestor, Advocates for South Beach Harbor)

Response

As described in Project Description, Service Driveway Access, South Beach Harbor Parking, and South Beach Park; and Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension, the SFRA intends to

construct a new vehicular access driveway to the parking lot serving South Beach Park, South Beach Harbor, and the ILWU building. This driveway would replace the existing access from King Street opposite Second Street, which is on land that would be part of the ballpark site. The SFRA could construct only the replacement driveway; however, because of its ongoing efforts to expand South Beach Park and concerns for effective coordination during construction of the Ballpark-South Beach Park, the SFRA has chosen to explore alternatives for expansion of the park. As indicated on p. IV.225, this replacement driveway would be shared with the ballpark.

SFRA options for its park expansion included the berming and extension of South Beach Park over a 210- to 250-space parking garage, which was analyzed in the EIR as an adjacent project. The park expansion is consistent with the provisions for the South Beach sub-area under the *Rincon Point - South Beach Redevelopment Plan*. Since publication of the Draft EIR, the SFRA is pursuing a less expensive 210- to 250-space surface parking lot to the south of the existing Park.

In reference to Table IV.E.40, p. IV.226, the purpose of that table is to describe freight and service vehicles parking rates and demand. For clarification, the first sentence on p. IV.225 has been revised as follows:

> **The east-side service area would be accessed <u>from</u> King Street <u>via the shared service driveway proposed by the Redevelopment Agency just</u> east of the site.**

Comments

Why isn't this plan [the SFRA plan to place a 200-250 space parking garage under South Beach Park] analyzed in the EIR? Surely this is planned by SFRA as a mitigation for the loss of Harbor parking due to the construction of the ballpark. Wouldn't construction of this garage take place concurrently with the construction of the stadium, leading to additional cumulative impacts? (San Francisco Tomorrow Waterfront Committee)

The parking garage under South Beach Park. This garage is mitigation for South Beach Harbor because of the ballpark. It should have been analyzed in the EIR. (Andy Katz, San Francisco Tomorrow Waterfront Committee)

Response

The parking garage under South Beach Park is not a "mitigation" for ballpark impacts. As discussed in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension, the SFRA has been working on the development of South Beach Park for some time. The SFRA completed construction of the existing Park and parking lot in 1996, and intended to expand these uses to the south and east as part of the South Beach Park Master Plan. However, because a portion of the proposed ballpark would be sited on approximately 2 acres of the existing Redevelopment Project area that is currently occupied by Port buildings and a portion of a surface parking lot containing about 200 spaces that serves the ILWU building, harbor, and park, with an entry on King Street opposite Second Street, the SFRA has been revising its plans for the park. Rather than just constructing a replacement vehicular access driveway, the SFRA has begun to explore various alternatives for completing park development pursuant to the *Rincon Point - South Beach Redevelopment Plan*.

One of these alternatives was the berming and expansion of South Beach Park over a 210- to 250- space parking garage. The bermed park over parking garage scheme was described in the EIR on page III.29 as an adjacent project. However, since publication of the Draft EIR, the SFRA has considered other alternatives and is currently designing a 210- to 250-space surface parking lot south of the existing park. The effects of this surface parking lot in combination with the ballpark would be essentially the same as those of the ballpark.

Comment

New Alternative Pier 40 Parking Site/Mitigation Measure
The lost parking for the marina clearly needs to be replaced because it is necessary that parking be available to haul sailing gear. The Agency has proposed one "solution" -- an underground garage which itself makes the expanded park less attractive by creating a 15 foot high mound.

As an alternative to that location, an alternative parking site at Pier 40 for the harbor along with all of the harbor related facilities currently proposed for the structures in the South Beach park should be analyzed. Parking in that location would be limited by the McAteer Petris Act to the harbor, rather than general parking. The traffic patterns would keep those using the

harbor and the harbor facilities out of the ballpark traffic flow and make it easier to control traffic directly around the ballpark. It will also allow for much more generous open space and a more usable flat expanse of park. Finally, the shadows which would be cast by the park structures would be eliminated.

Shifting the traffic from the harbor away from the ballpark would itself be beneficial to the traffic problems encountered with this project. Among them, there would be reduced potential conflict between autos using the driveway [users of 242 spaces would disappear] and pedestrians walking to the ballpark -- the other users would to a great extent be players and others who would be driving in earlier. In addition, eliminating potential hotel use on Pier 40 would eliminate the need to include a cumulative development scenario which includes the traffic problems related to that site. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

As described above in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension, most of the ballpark would be sited on the proposed *Rincon Point - South Beach Redevelopment Plan* amendment area; however, a portion of the ballpark would be sited on approximately 2-acres of the existing Redevelopment Project area. The 2 acre area is currently occupied by Port buildings and a portion of a surface parking lot that serves the ILWU building, South Beach Harbor, and South Beach Park, with an entry on King Street opposite Second Street. Since the existing King Street entry to the parking lot would be removed, the SFRA intends to construct a replacement vehicular access driveway to the park, harbor, and ILWU building parking lot. The SFRA has agreed to share this new driveway with the ballpark, in order to better accommodate vehicular flow in the vicinity, facilitate pedestrian accessibility, and minimize the number of driveways onto King Street.

The result of ballpark construction, if nothing else were to be done east of the ballpark site, would be the construction of the replacement driveway and the loss of fewer than 30 spaces to the west of the ILWU building. The remainder of the park and harbor parking area, as well as the existing South Beach Park, would not be affected by the above actions.

The commentor indicates that there are some environmental advantages to placing the parking at Pier 40 rather than in an underground garage east of the ballpark. As discussed in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension, the SFRA had been exploring the feasibility of the berming and expansion of South Beach Park over a 210- to 250-space parking garage. This proposal was described in the EIR as an adjacent project. It is consistent with the provisions for the South Beach sub-area under the *Rincon Point - South Beach Redevelopment Plan*. The SFRA has also been evaluating the feasibility of constructing a three-level parking garage on Pier 40. However, at this time the SFRA has not made a decision on either of those proposals because of associated high costs and is considering a less expensive 210- to 250-space surface parking lot to the south of the existing park. The effects of this surface parking lot in combination with the ballpark would be essentially the same as those of the ballpark and the sub-surface garage assumed in the background conditions in the EIR. Therefore, there would be a less than significant change, if any, from relocating the harbor and park related parking to Pier 40.

With respect to the possibility of "more generous open space and more usable flat expanse of park," the use of land east of the ballpark and south of the existing park as a surface parking lot does not preclude conversion to park use at such time as adequate funding is available and an alternative location for the parking is secured, whether on Pier 40 or elsewhere in the vicinity. Also, as a surface parking lot, there would be no new shadows "cast by park structures."

Regarding potential hotel use on Pier 40, such use has been considered both by the SFRA and by the Port of San Francisco. However, this use would require an amendment to the *Rincon Point - South Beach Redevelopment Plan* as well as amendments to the *General Plan*. It is not related to either the ballpark or the expansion of South Beach Park (see Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension regarding the South Beach Park Master Plan). Until there is a specific

development proposal for construction of a Pier 40 hotel, it would be speculative to include such in the cumulative context.

Comment

Pier 40 should be further developed for its current use, which is parking and harbor support. This separates water dependent uses from the Stadium. It is astonishing that Redevelopment is laying plans to develop Pier 40 into a 250 room Hotel, with no on site parking. It is illogical to plan a project that relies on the redesign of the Park, Harbor Parking and relocation of Pier 40 tenants, without a plan in place identifying the feasibility, both monetarily and with regard to compliance with Port, BCDC and State of California Boating and Waterways rules and requirements. (L. Joseph Boss)

Response

As discussed in the Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension, hotel use on Pier 40 has been considered both by the Agency and by the Port of San Francisco; however, development of the hotel would require an amendment to the *Rincon Point - South Beach Redevelopment Plan* as well as amendments to the *General Plan*. It is not related to the ballpark or the proposed Redevelopment Plan amendment (see p. II.7) and is not part of the planned expansion of South Beach Park (see Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension). Also, parking for the hotel would be determined in conjunction with review of a hotel proposal, when an actual proposal is under consideration.

CONSISTENCY WITH EXISTING PLANS AND POLICIES

San Francisco General Plan

Comment

The Redevelopment Agency has worked very long and hard...in the South Beach Redevelopment Area to set quality standards and develop a long range plan ensuring this emerging neighborhood will take its rightful place in the City. No effort has been made to dovetail this stadium with the City's General Plan, the Redevelopment Plan, the Waterfront Land Use Plan, the Port plan, etc. (Michael Karasik, Bayside Village Associates)

Response

As discussed on p. I.1, pp. I.8 - I.10, p. II.2, pp. II.7 - II.8, and IV.1 of the EIR, Proposition B, a 1996 voter initiative on the ballpark project, directs City officials to proceed to amend the City's General Plan, codes, and ordinances in a manner consistent with Proposition B.

The EIR addresses the consistency or the lack thereof with regard to plans and policies adopted by public agencies relevant to the proposed project (pp. IV.1 - IV.16) and amendments to these plans as proposed by the City. Implementation of the project, and the extent to which cooperation among agencies results in achievement of goals of the various agencies, is within the control of the agencies themselves.

Changes to the proposed amendments to the City's General Plan are discussed elsewhere in this subsection.

The Redevelopment Agency's plans for the area are discussed in Project Description, Service Driveway Access, South Beach Harbor Parking, and South Beach.

The project's consistency with the Port of San Francisco's *Waterfront Land Use Plan* is discussed in Port of San Francisco of this section.

Comments

RECREATION AND OPEN SPACE ELEMENT
IV.2 POLICY 3.c Any new shading should be remedied to the extent feasible by expanding opportunities for public assembly and recreation in indoor and outdoor settings.

We suggest deleting this wording, and instead using the following "In March 1996, the San Francisco voters approved the development of a ballpark which will partially shade an open space not under the administrations of the Recreation and Parks Department. This is a one-time only directive by the electorate which effectively exempts the Ballpark from the shade requirements, but does not apply as a precedent to other projects."

URBAN DESIGN ELEMENT
IV.4 POLICY 9.c Release of a street area may also be considered favorably when it is associated with a development which will enhance public enjoyment of San Francisco Bay by providing a place of public assembly and recreations, with unique vistas and overviews of the Bay and City that include portions that are publicly accessible during daytime and evenings.

We contend that the proposed wording in the DEIR is entirely specific project-serving (and thus, not appropriate in a General Plan) and which is unnecessary because language in subsection b.(3) already says much the same thing in a general way:

(existing) "b. Release of a street area may be considered favorably when it would not violate any of the above criteria and when it would be: (3) Necessary for a significant public or semi-public use, where the nature of the use and the character of the development proposed present strong justifications for occupying the street area rather than some other site."

The words "when it would not violate any of the above criteria" are important because b.(3) refers back to a number of criteria under b. and a. which the Ballpark development would have to meet. If this new subsection c. is inserted, it appears to allow the criteria in a. and b. to be ignored.

IV.5 OBJECTIVE 3.D Larger, taller buildings providing places of public assembly and recreation may be appropriate along the waterfront if they provide unique overviews or vistas that include portions that are publicly accessible during daytime and evenings, and provide maximum feasible access to the shoreline

IV.8 POLICY 1 Taller buildings and structures such as a ballpark may be appropriate if they provide unique vistas and overviews over the Bay and city that include portions that are publicly accessible during daytime and evenings, and provide maximum feasible access to the shoreline.

This language would contravene Proposition H, which was passed by the electorate. It would permit buildings and structures other than the Ballpark to be taller than the height limit if, for example, they installed a health club in the upper stories. Or it might permit the construction of an over-the height-limit Ferris Wheel structure, recently turned down by the Planning Commission and the Board of Supervisors. It is very dangerous to insert language which might permit other tall buildings by precedent, and a barrage of developers might make use of this provision to take for themselves the most unique vistas on the West Coast, simply by granting some view opportunities that have publicly accessible portions.

We suggest substituting the simple phrase "In March 1996, the San Francisco voters approved the development of a ballpark with a height that is in excess of the maximum height permitted in this area. This is a one-time only directive by the electorate which effectively exempts the Ballpark from the height limit, but does not apply as a precedent for other projects." (San Francisco Tomorrow Waterfront Committee)

p. IV.5 OBJECTIVE 3D Strike Larger, Taller Buildings. Insert ballpark to conform to the voters of S.F. (Jeffrey Leibovitz)

I am very concerned about the changes that are proposed to be made in the city's General Plan and in the zoning. And nobody has addressed this before. I think this may be a little arcane, and I'm sad to say that. But the point is that when you make changes in the General Plan to accommodate this special case, which I agree was voted by the electorate, and changes may have to be made or exceptions may have to be made, but you do not change the basic language of the master plan of the City of San Francisco in the following ways.

Under the urban design element, which is one element of the Master Plan, this wording is proposed to be placed into that element. This is for all of the city it would apply. Larger, taller buildings providing places of public assembly and recreation may be appropriate along the waterfront if they provide unique views and vistas that include portions that are publicly accessible during daytime and evenings and provide maximum feasible access to the shoreline. That means that all along the waterfront you would permit, suddenly, by this change in the General Plan other tall buildings that were never put, you know -- were never allowed in the Master Plan.

So, without any further environmental study, in other words, simply stated in the environmental impacts section, but no mitigation of this, no actual study of what the impacts would be if other developments decided to take this up. The strange thing is, though, that whoever worded these master plan or general plan changes did some fairly innocuous statements that are okay. In other words, you can say that the public has agreed to a new stadium on Pier 46B. You can state that everywhere. But, instead, there is more ample language allowing that other larger, taller buildings could be built along the waterfront has been placed in these master plan changes.

So...I recommend you to look in Roman numeral IV, Pages 2 through about Page 10. You will see lots of changes to our general plan I don't think that should be made for the ballpark. Just make the exception. The voters did that. That's done. Don't go farther. (Mary Anne Miller)

Response

On June 27, 1996, the Planning Commission approved amendments to the Preliminary Plan for the *Rincon Point - South Beach Redevelopment Plan* to expand the Preliminary Plan boundaries in preparation to expand the Project Area. As part of the approval, the Planning Commission issued proposed language for the General Plan Amendments.

Since that time, there have been revisions to the proposed General Plan Amendments. The Planning Commission will consider these specific amendments on June 26, 1997.

The following are the proposed amendments that have been revised since publication of the EIR.

The second paragraph on p. IV.3 of the EIR has been replaced as follows:

> **A ~~4.8~~ 2.5 acre shoreline park is proposed at Rincon Point, and a 6.8 acre ~~public~~ South Beach park ~~and small boat harbor~~ is being developed at the base of Second Street adjacent to South Beach Harbor as part of the Rincon Point - South Beach Redevelopment project.**

The first sentence of the last paragraph on p. IV.3 of the EIR has been replaced as follows:

> **Restricted Land Uses: Office, residential, public assembly and recreational sports facility with associated commercial uses, water ~~related~~ orientated commercial uses such as restaurants, hotels and shops, and non water-related industrial uses are appropriate only in the areas designated in this plan or other components of the General Plan.**

The following text is added to p. IV.4 under Urban Design Element, Objective 2, Conservation, Policy 9.

b.(3) Necessary for a significant public or semi-public use, or public assembly use, where the nature of the use and the development proposed present strong justifications for occupying the street area rather than some other site;

The first item on p. IV.4 of the EIR on South Beach Harbor and Park is deleted. The last item on p. IV.4 of the EIR on Street Space is deleted. Neither of these items are proposed to be amended.

The second paragraph on p. IV.8 of the EIR has been replaced to read as follows:

PAGE II.7.14

OBJECTIVE 10, URBAN DESIGN

POLICY 1 Preserve the physical form of the waterfront and reinforce San Francisco's distinctive hill form by maintaining low structures near the water, with an increase in vertical development near hills or the downtown core area. Larger buildings and structures with civic importance may be appropriate at important locations.

Item 4 in the last sentence of the last paragraph on p. IV.8 of the EIR has been replaced as follows:

Where the public enjoyment of the Bay will be enhanced by providing a place of public assembly and recreation which allows unique vistas and overviews that include portions that are publicly accessible during daytime and evenings, consistent with ensuring public safety.

The second paragraph on p. IV.10 of the EIR has been replaced as follows:

~~**Retain the Pier 46B area for a Port maintenance facility and other maritime uses. If no longer needed by the Port for maritime use develop as a predominantly residential, mixed use development and include parking for the adjacent marina.**~~

Develop an open-air ballpark with a maximum of 45,000 seats with related commercial uses including, but not limited to office, retail, restaurants, live music performances and other forms of live entertainment, in a setting of waterfront public spaces.

The following text has been added after the second paragraph on p. IV.II of the EIR:

Land Use Index Amendments

PAGE III.1.29

Map 4, Urban Design Guidelines for Height of Buildings

Replace the "0-40" designation presently placed on the ballpark site with the "89-160 ft." designation.

Page III.1.12

Map 5, North China Basin Area Land Use Plan

Replace the "Maritime" designation presently placed on the Pier 46B with a "Ballpark" designation.

The relationship of the proposed project to relevant General Plan policies is discussed on pp. IV.1 - IV.11. Taken as a whole, the General Plan text changes proposed by the City are consistent with the overall intent of the General Plan and are intended to provide guidelines for development of a ballpark at the China Basin site. While some of the proposed text changes could apply to other sites or projects, land use, height limits, and design controls for other sites be under the authority of the City, the Redevelopment Agency or the Port of San Francisco. These decisions would be reviewed on the basis of the General Plan, the City Planning Code, applicable redevelopment plans and the *Waterfront Land Use Plan*. All these plans include specific guidelines for development, in addition to the General Plan changes discussed above.

Comment

This parking use adjacent to the waterfront is in direct conflict with the stated objectives of the San Francisco General Plan (in particular Policies 4 and 8 of the Commerce and Industry Element), the McAteer Petris Act (California Government Code Sections 66600 *et seq.*), and the objectives of BCDC (Waterfront Special Area Plan) and the State Lands Commission. (Corinne W. Woods, Secretary, Bay View Boat Club)

Response

The proposed parking areas south of the Channel as shown in Figure II.D.5, p. II.19 are the general locations proposed for the interim parking uses. Parking as an interim use would not preclude other uses in the future and is consistent with the provisions of the *Mission Bay Plan*. The Zoning Administrator must approve any interim use within the area covered by the Mission Bay Plan pursuant to City Planning Code Section 985.(d). If permanent parking is provided, the specific location of the parking areas may be subject to City approvals as well as owner consent. The *San Francisco General Plan* outlines objectives under various elements, such as Commerce and Industry, Recreation and Open Space, etc. The decision-makers, in this case the Planning Commission, will balance the competing concerns of each of the Elements of the General Plan in their decision whether to approve the project. Approval of the project usually includes conditions of approval. Those conditions could relate to the specific location of parking and other elements of the project. The recently updated Seaport Plan Policies (p. 11) governing Port Priority Use areas allow interim uses and associated improvements that can be converted to port use when the site is needed for marine terminal or other port priority use. BCDC and State Lands will make separate determinations on the parking areas as part of their permit and approval processes.

Comment

Page IV.10, NE Waterfront Plan: The Northeast Waterfront Plan, even after its proposed amendment, calls for closing Townsend Street between Second and the Embarcadero to all but local and service vehicle traffic. The proposed pre- and post- game routing plan that detours all Embarcadero Traffic onto Townsend Street is in direct conflict with this General Plan policy. Instead, Embarcadero traffic should use King and Second streets for the detour to Townsend Street west of Second Street. (Steven L. Vettel, Residential Properties Group)

Response

In reference to the *Northeastern Waterfront Plan*, the commentor cites the pre- and post-game routing plans which detour ballpark traffic onto Townsend Street between Second Street and The Embarcadero. The routing of ballpark traffic would not be considered in conflict with Walkways and Open Space Policy 1 on p. II.7.37 of the *Northeastern Waterfront Plan* because regular traffic would not be routed onto Townsend. Also, the detour would occur for a few hours before and after a game. At all other times, Townsend would allow local and service vehicle traffic only. Also, the routing plans are identified on p. V.12 of the EIR, as preliminary and subject to change by the Ballpark Transportation Coordinating Committee, to reflect actual experience.

Comment

Page IV.9 Policy 2, line 5, last word is a typo "berms" rather than "beams". (Rincon Point South Beach CAC)

Response

The fourth sentence under "Policy 2" on p. IV.9 has been revised to read as follows:

> **Buffer the park from The Embarcadero with devices such as landscaping, ~~beams~~ berms, and changes in elevation.**

Comment

Page IV.7, North China Basin Area: Piers 42-46A (not Piers 24-46A) have been removed. (Steven L. Vettel, Residential Properties Group)

Response

The second sentence of the first paragraph on p. IV.7 of the EIR has been revised as follows:

> **Piers ~~24~~42-46A and a portion of Pier 40, which are presently almost vacant and in unsound condition, would be removed and the area developed as a full service marina and small boat harbor.**

Mission Bay Specific Plan

Comment

Page III.10, Mission Bay Plan: For how long does the Mission Bay Specific Plan allow interim uses, such as surface parking? (Steven L. Vettel, Residential Properties Group)

Response

Temporary parking areas in the Mission Bay Plan area would be guided by Article 9 of the City Planning Code, Mission Bay Districts. City Planning Code Section 985(d) Rules Regarding Authorization of Temporary Uses, allows parking uses to be authorized by the Zoning Administrator for up to ten years of use. See response below.

Comment

Page IV.11, Mission Bay Plan: Interim parking uses are authorized by the Mission Bay Plan for only 10 years, yet the Giants propose surface parking for an indefinite period, at least until 2015. This appears to be in conflict with the plan. A commitment or requirement to construct permanent structured parking within 10 years may be necessary for plan consistency. (Steven L. Vettel, Residential Properties Group)

[A]side from all the warring factions and political game playing, this project should not go forward until a firm parking agreement is reached with Catellus for the 5000 spaces and until another 2500 parking spaces can be specifically ear-marked for fans.

This stadium can be made to work for the benefit of both the Giants and the City's fans, but there has to be much more ingenuity and resourcefulness displayed. The present "hands-off," cheapy-cheapy approach simply will not mitigate the traffic problem; i.e., now,--"a disgrace to mankind." Furthermore, every forecast indicates that the problems will only worsen. San Franciscan's simply do not need this additional aggravation and expense. (Silva B. Creg)

Response

In reference to the proposed interim parking, the commentor indicates that the interim parking proposed to be located south of China Basin Channel may be in conflict with the City's *Mission Bay Specific Plan* (EIR p. IV.11). The Mission Bay Plan specifically authorizes interim uses. Therefore, interim uses approved by the Zoning Administrator are not inconsistent with the Mission Bay Plan. The Giants have proposed dedicated parking

south of the Channel on only an interim basis, and negotiations are still underway with the owners of the available property, Catellus Development Corporation and the Port of San Francisco, both of which are currently exploring various alternatives for development of the property. In particular, given that the conceptual plan prepared for Mission Bay proposes residential, commercial, office, and research and development uses and that specific waterfront proposals for Port land east of Mission Bay continue to evolve, it is likely that some structured parking would be developed south of the Channel and some General Plan amendments would be enacted prior to the end of the 10-year interim time period. Permanent surface parking for the Giants is not included in Catellus' conceptual plan. Further, towards the end of the interim time period, the Giants would be exploring parking options if structured parking were not to become available on a timely basis. Accordingly, the EIR on p. II.21 assumes that structured parking would be available within a definite time period, by the year 2015. The EIR analyzes reasonably foreseeable development in the Mission Bay Area. The EIR also includes a "No Dedicated Parking Variant," pp. VII.9 - VII.16, which would not place any parking south of the Channel.

The City anticipates that the Mission Bay Plan may be amended in the near future to reflect the conceptual plan being proposed by the Catellus Development Corporation. The EIR analyzes the reasonably foreseeable changes to the Mission Bay Plan based on the conceptual plan and anticipates that permanent parking would be developed within the same general location as the interim parking as part of the effort to re-plan the South of China Basin Channel area. The EIR notes that permanent parking is part of the conceptual plan developed by Catellus Development Corporation for the South of China Basin Channel area.

South of Channel Interim Parking

Comment

I want to go now to the parking changes, the parking south of the channel. It is proposed that 5,000 spaces will be put there. You know that underlying that is a zoning of OS -- MB dash OS. It has an open space zoning. Now, that is stated in the environmental impacts, but

there is no study of it. So, suddenly we have parking placed where open space was decreed before.

You know also on Pier 48 and Pier 50, if we are going to get maritime uses there, we have to have a little bit of back pier space. It can't all be parking for the ballpark. So, San Francisco Tomorrow is going to suggest that you re-study the environmental impacts regarding the General Plan, that you re-study that parking south of the channel. And that if you can find it consistent to have parking placed so close to the ballpark, not inconvenience people who have cars at all, not cause them to take a shuttle, not cause them to take transit, make it so available to them and put it on top of open space, then I guess we need another study for that. (Mary Anne Miller)

Response

Portions of the proposed South of Channel interim parking area are currently zoned for open space. The northeastern area of the proposed parking is designated as "Mission Bay Wetlands Park" in the Mission Bay Plan. The Mission Bay Plan includes policies and design guidelines for this area; if the "Wetlands Park" designation is implemented. The *Draft Waterfront Land Use Plan* designates eastern portions of the parking areas as "Open Space - Public Access Areas."

The area is not a City park, nor has it been developed for use as a public park. Use of the site for interim parking would not result in the loss of a public park, nor does it change its basic land use character, since no structures would be constructed that would preclude any long-term development of that site such as open space. As noted in the second response above in *Mission Bay Specific Plan,* the approval of interim parking on the site is permitted by City Planning Code Section 985(d). When considering the approval of this interim use, the Zoning Administrator must find that the use is consistent with the Master Plan and phasing principles of the Mission Bay Plan. The interim use of parking does not preclude any future development as a park, wetlands, or priority port uses.

City Planning Code

Comment

Page IV.12, Planning Code: Section 607 of the Planning Code regulates signs in an M-2 district. The scoreboard is not consistent with these requirements and cannot be approved as proposed. Prop. B did not amend these provisions. (Steven L. Vettel, Residential Properties Group)

Response

Regarding Section 607 of the City Planning Code, the scoreboard is an "exempted sign," because it is within the ballpark and designed to be viewed primarily by the patrons within the ballpark, pursuant to Section 603(g) of the City Planning Code. Therefore, it is not subject to the regulations contained in Article 6 of the Planning Code, including Section 607.

Priority Policies - Planning Code Section 101.1 (Proposition M)

Comments

Page III.1, "Consistency with Existing Plans and Policies" fails to give a summary of the role of the Planning Commission and Planning Department, the one agency in government most central to, and charged with the responsibility of determining "consistency with existing plans and policies." The majority of the site is currently under the jurisdiction of the Planning Commission, which has full authority and control over non-maritime uses of the site. The Planning Commission has responsibility for making findings of consistency with the General Plan, adopting appropriate amendments to the General Plan as needed, making findings of consistency with the "Priority Policies of Code Section 101.1," exercising Conditional Use review and applying the provisions of the Planning Code over the proposed project, which requires affirmative findings that the project is consistent with the Objectives and Policies of the General Plan. This central and key role of the Planning Commission should be noted. (Rincon Point South Beach CAC)

A key and compelling shortcoming of the DEIR is that the "project" is too narrowly defined, and as such does not comply with the Priority Policies of Planning Code Section 101.1. Given the decisions and actions that are necessary to approve the new ballpark, the DEIR must cover a "Priority Policy Conforming Project." Official actions that require conformity with priority policies include:

- Amendment of the City's General Plan

- Amendment of the Rincon Point - South Beach Redevelopment Plan and Design for Development
- Rezoning of the Ballpark project site
- Conditional Use Authorization of the Ballpark Project
- Owner Participation and Land Lease agreements with the city

In each of the foregoing actions, city officials must make findings that their decisions are consistent with the Priority Policies set forth in Planning Code Section 101.1. Consequently the "project" must be defined in terms that support Planning Code Section 101.1. We believe the project defined in the DEIR fails to meet the standards established by Planning Code Section 101.1. We believe that the DEIR is inadequate because it fails to analyze a project alternative that is consistent with the priority policies of Planning Code Section 101.1 (Proposition M, 11-4-86).

Briefly, we feel that all Eight Priority Policies are relevant to the proposed new Ballpark at China Basin:

- "That existing neighborhood serving retail uses be preserved and enhanced..."
- "That existing housing and neighborhood character be conserved and protected..."
- "That the city's supply of affordable housing be preserved and enhanced;"
- "That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking;"
- "That a diverse economic base be maintained by protecting our industrial and service sectors..."
- "That the city achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake."
- "That landmarks and historic buildings be preserved."
- "That our parks and open space and their access to sunlight and vistas be protected from development..." (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Each one of the Eight Priority Policies has direct relevance to the Ballpark project, and must be addressed by the Giants, the city, or both. Actions or project components which we feel would contribute to a "Priority Policy Conforming Project" that is responsive to each of the Eight Priority Policies include:..."That existing housing and neighborhood character be conserved and protected..." "That the city's supply of affordable housing be preserved and enhanced..." These priority policies are directly linked to maintaining neighborhood livability and quality of life standards. If housing and neighborhood character are to be protected, and the supply of affordable housing enhanced, the quality of life in the South Beach, Rincon Hill, China Basin Channel, Mission Bay, Potrero Hill and other affected neighborhoods must be maintained and enhanced. Maintaining neighborhood quality and livability will insure that new housing units will be built in the Rincon Hill - South Beach area, and that substantial numbers of affordable housing units will also be built as required by the redevelopment plan. In order to assure that new housing will be built, the Ballpark

Project must directly and effectively deal with, avoid, and mitigate problems related to traffic congestion, air quality, noise from events, crowds, and construction; litter and graffiti; crime and safety issues. These concerns were overwhelmingly affirmed by 600 survey questionnaires and at two community forums, each with over 150 people in attendance...The DEIR must include an alternative that incorporates the foregoing goals and associated mitigation measures that implement these goals. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

The Giant's voter mandate to build a free Ballpark is not more important than Proposition M. I am giving you the benefit of the doubt and have come up with the only possible explanation I can think of as to why this extensive investment of property owners, developers and small business owners is not of importance in complying with the voter mandate of neighborhood protections found in Proposition M. (Louise Bird)

I was very disappointed in the EIR's utter failure to...address neighborhood concerns as required by the Accountable Planning Initiative (a.k.a. "Prop. M"). (Aidan Costello, Community Awareness Committee, 355 Bryant Homeowners Association)

These neighborhood quality of life standards are mandated by Proposition M - Priority Policies. (Martin Fay, Rincon Point - South Beach CAC)

We believe that the neighborhood participation requirements which we are calling for here are critical to the successful integration of the ballpark into the area. Further, we believe that these, or very similar measures must be adopted by the Giants and the City for the project to be in compliance with the requirements of Proposition M. That Proposition, now a part of the Planning Code, forbids the approval of General Plan amendments (as this project will require) unless the project is consistent with the Eight Priority Policies. Those Policies include requirements that "existing neighborhood serving retail uses be preserved and enhanced;" and that "existing housing and neighborhood character be conserved and enhanced." We believe that this project, with the adoption of neighborhood-serving mitigations as outlined above, can be found to comply with those requirements. Without such measures being adopted, however, we feel sure that the project cannot be approved at all. (Rick Mariano)

Response

Section 101.1 of the Planning Code requires that the City find that the proposed project is consistent with the Priority Policies established by Proposition M. Proposition M findings would occur as part of the approval process. The determination on Proposition M includes review of all aspects of the project and public input prior to making such a determination.

Chapter II, Project Description, pp. II.27 - II.28 of the EIR discusses the eight Priority Policies in Code Section 101.1, and notes that the Planning Commission or Planning Department would make a determination of the project's conformance with the Priority Policies. Not every project can or must conform with each and all of the eight Priority Policies. The decision-makers may require changes or conditions to the project that would result in the project conforming to the Priority Policies. The EIR provides information on the project's environmental impacts on the neighborhood, including traffic, noise, consistency with existing plans and policies, visual quality and lighting, land use, shadows and wind, air quality, water quality and aquatic ecology, contamination and environmental risk, seismicity and the growth-inducing impacts of the project. This information would be considered by the Planning Commission in making findings on Section 101.1.

Comment

The proposed project, absent a real commitment to rehire the existing 3Com Park workforce at current levels of compensation, could be inconsistent with existing plans and policies to which it is subject.

Both the Initial Study, and the Draft EIR state that the proposed project is subject to and should be consistent with a number of public agency policies, plans, and regulations including the San Francisco General Plan, the Draft Waterfront Land Use Plan, and Proposition M, the Accountable Planning Initiative (Planning Code Section 101.1). Many of these policies, plans, and regulations speak to employment in one way or another (e.g., enhancement of resident employment, creation/retention of quality job opportunities, assurance that all segments of the labor force benefit from economic growth). If the current workforce is not offered continued employment at the proposed stadium or alternately, if the current workforce continues to be employed at the new facility but at lower wage and benefit levels than they currently receive at 3Com Park, will this project be consistent with the applicable policies? Is it the policy of the City of San Francisco to facilitate the creation of lower paying jobs at the expense of higher paying jobs? It is known that this will happen? No, it is not. Is it known that this will not happen? No it is not.

The Project Sponsor should be required to provide sufficient information to environmental review staff regarding continued employment of current 3Com Park staff, wages and benefits to be paid compared with current compensation for similar positions, and any other relevant information to allow for a review of existing plans and policies for consistency on the subject of employment and economic development. If any such inconsistencies are found,

appropriate measures should be taken to bring the proposed project into compliance with the relevant plan or policy. (Kim Jackson, Senior Research Analyst, H.E.R.E. Union Local 2)

Response

According to the project sponsor most of the 1,400 jobs directly related to the games at the proposed ballpark would be filled by 3Com Park employees who would transfer to the ballpark at China Basin, as stated on p. II.25 of the EIR. How the San Francisco Giants would continue to employ current 3Com park staff and wages and benefits are not a subject of the EIR. Under CEQA, the purpose of the Plans and Policies discussion is to provide an overview of public policy most relevant to the physical changes in the environment that may occur if the project is implemented.

See response above in Priority Policies - Planning Code Section 101.1 (Proposition M).

Port of San Francisco

Comment

Page III.15, line 26, revise as follows..."Approval by the Port Commission is required for any uses on land under its jurisdiction," add..."Conditional use authorization by the Planning Commission is required for most non-maritime uses on lands under Port jurisdiction." (Rincon Point South Beach CAC)

Response

Proposition B provided an approval process (Conditional Use Authorization) for development in the Northeast China Basin Special Use District, Planning Code Section 249.18. The commentor is referring to text that provides an overview of the Port of San Francisco's activities. With regard to the Conditional Use authorization, Proposition B provided an approval process (Conditional Use Authorization) for development in the Northeast Special Use District, Planning Code Section 249.18.

San Francisco Redevelopment Agency

Comment

Page III.18-20, Rincon Point - South Beach Redevelopment Plan: The description of the objectives and implementation of the redevelopment plan are inadequate. Elimination of blight, infrastructure improvements, such as streets, sidewalks, landscaping, and sewer, and status of the Plan's implementation (including the number of residential units completed to date and the number of proposed units likely to be completed or under construction by the year 2000) should be described. (Steven L. Vettel, Residential Properties Group)

Response

Pages III.18 - III.20 of the EIR describe the goals, boundaries, and major proposed land uses of the *Rincon Point - South Beach Redevelopment Area*; the redevelopment area is shown on Figure III.A.1, p. III.13, Land Use Districts. More detailed information on the proposed amendment to the *Rincon Point - South Beach Redevelopment Plan* prepared by the SFRA will be available in documentation to the Board of Supervisors prior to Board action on the project.

Comments

Page IV.13, Redevelopment Agency: The discussion of impacts on the Redevelopment Plan is completely inadequate. The discussion must include impacts on the current objectives of the plan, not merely a statement that the plan will be amended to include the project site. (Steven L. Vettel, Residential Properties Group)

Page III.18, The existing environmental setting should describe the goals of the Rincon Point – South Beach Redevelopment Plan as background context for how the new ballpark conforms with or differs with RP-SB Plan objectives. (Rincon Point South Beach CAC)

Response

The proposed amendments to the *Rincon Point - South Beach Redevelopment Plan* are described on p. IV.13 of the EIR. The objectives in the Redevelopment Plan would not be directly affected by the project. As discussed on p. IV.14, the San Francisco Redevelopment Agency would need to find the revised land use descriptions and development standards consistent with State Redevelopment Law and policies of the existing plan.

Comment

Page III.12, The Redevelopment Land Use Plan and Mission Bay Land Use Plan should be included as background. The current status and extent of implementation for each of these plans should be discussed. (Rincon Point South Beach CAC)

Response

The *Rincon Point - South Beach Redevelopment Plan* is discussed on EIR pp. III.18 - III.20, and the *Mission Bay Specific Plan* is discussed on EIR pp. III.10 - III.12. Although the Mission Bay Plan remains as the controlling General Plan document for the Mission Bay area, no development has occurred in Mission Bay since the plan was adopted in 1991. Within the South Beach Redevelopment Project sub-area, about 75 percent of the land has been developed pursuant to the Redevelopment Plan which was adopted in 1981, although several sites remain to be developed, most notably Site L, an 81,000-square-foot site at King and Second Streets. Currently, that site is proposed to be developed with residential uses. This is reflected in the text on EIR pp. IV.21 - IV.22.

A portion of the ballpark would be sited on approximately 2 acres of the existing Redevelopment Project area that is part of the South Beach sub-area designated in the Redevelopment Plan as a "Major Park," and includes a portion of a surface parking lot with an entry on King Street that serves the ILWU building, South Beach Harbor, and South Beach Park. This area, along with the Redevelopment Plan amendment area, would be designated as "Ballpark." Because the existing King Street entry to the parking lot would be removed, the San Francisco Redevelopment Agency intends to construct a replacement vehicular access driveway to the Park, Harbor, and ILWU building parking lot adjacent to and east of the Ballpark. The primary function of the driveway would be consistent with the uses permitted under the "Major Park" designation. The SFRA has agreed to share this new driveway with the ballpark, in order to better accommodate vehicular flow in the vicinity, facilitate pedestrian accessibility, and minimize the number of driveways onto King Street.

The San Francisco Redevelopment Agency has been working on the development of South Beach Park for some time. The SFRA completed construction of the existing Park and parking lot in 1996, and intended to expand these uses to the south and east as part of the *South Beach Park Master Plan*. However, because a portion of the proposed ballpark would be sited on approximately 2 acres of land that the SFRA was proposing as part of the Park expansion, SFRA has begun to explore various alternatives for completing Park development. (See Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension, for a discussion of SFRA planning in the *Rincon Point - South Beach Development Plan*.)

Comment

Page III.19, line 28. Is reference to Planning Code section 290 appropriate and accurate? This should be checked since the area east of the project site is zoned 40-X and Code section 290 only applies to land zoned OS (Open Space). (Rincon Point South Beach CAC)

Response

The *Rincon Point - South Beach Redevelopment Plan* applies the height limitations set forth in Section 290 of the Planning Code for areas designated as Open Space (OS) in the Rincon Point - South Beach Redevelopment Area.

Comment

Page III.19 of the EIR, last paragraph should read..."The Board of Supervisors (not Redevelopment Agency) would expand the Redevelopment Area to include the entire project site." Note: The Redevelopment Agency does not have the authority to expand redevelopment areas. This authority is with the Board of Supervisors, on recommendation from the Planning Commission. (Rincon Point South Beach CAC)

Response

The commentor is correct that approval by the Board of Supervisors would be required to change the boundaries of the Redevelopment Area. The first sentence of the last paragraph on p. III.19 of the EIR has been revised as follows:

The ~~Redevelopment Agency~~Board of Supervisors would expand the Redevelopment Area to include the entire project site;...

Bay Conservation and Development Commission

Comment

Figure III.A.3: Please map the BCDC jurisdictional boundary rather than merely describing it. A lay person cannot understand this. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Figure III.A.3, p. III.16 shows waterfront jurisdiction. A map is not available, but BCDC jurisdiction generally extends 100 ft. from the mean high tide line, over the Port Walk and public plazas, uses along the right-field wall, and a portion of the playing field along the right field line. In addition, BCDC will have jurisdiction of portions of the dedicated ballpark parking that are located within the shoreline band and within the area covered by the Port Priority designation pursuant to BCDC's Seaport Plan.

Page II.30 of the EIR states that areas of fill required by the project and other elements of the project are within BCDC jurisdiction. BCDC would decide the consistency of the project with the San Francisco Bay Plan and the Waterfront Special Area Plan, to the extent the provisions of those plans apply to the project. The project sponsor will be required to submit an application for a major permit for the project.

Comments

Page IV.15, Waterfront Plan: A commitment or requirement to construct permanent structured parking (not located on the waterfront) may be necessary for consistency with the Waterfront Land Use Plan. The Bay Conservation and Development Commission (BCDC) would review the project for consistency with BCDC's Waterfront Special Area Plan. (Steven L. Vettel, Residential Properties Group)

The explanation of BCDC concerns at III.20-21 is extremely limited. BCDC also has strong concerns about and a mandate to protect the quality of public spaces and the impact on water dependent uses such as the marina. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

The two paragraphs on p. III.20 of the EIR concerning the Bay Conservation and Development Commission have been deleted, and have been replaced by the following:

The Bay Conservation and Development Commission (BCDC) has permit authority over development of the Bay and the shoreline pursuant to the provisions of the state McAteer-Petris Act (California Government Code sections 66000 et seq.). The Act requires the BCDC to prepare a "comprehensive and enforceable plan for the conservation of the water of San Francisco Bay and the development of its shoreline." In 1969 the Commission submitted the completed *San Francisco Bay Plan* to the Governor and the Legislature. The McAteer-Petris Act was later amended to give the Bay Plan the force of law.

BCDC regulates all filling, dredging, and changes in use in San Francisco Bay; regulates new development within 100 ft. of the shoreline subject to tidal action to ensure maximum public access to the Bay is provided; and ensures that the limited amount of shoreline suitable for regional high-priority water-oriented uses is reserved for such purposes. BCDC policies are articulated in the *San Francisco Bay Plan* and *Waterfront Special Area Plan* which outline permitted uses and conditions for such uses on piers and adjacent areas.

Of primary concern to BCDC is the placement of new "fill" in the Bay for purposes of new development. The McAteer-Petris Act imposes strict standards for the placement of fill, restricting it to uses that are: 1) necessary for public health, safety or welfare; 2) water-oriented uses, such as water-dependent industry, water-oriented recreation, public assembly and other similar uses; or 3) minor fill to improve shoreline appearance and public access. Fill must be the minimum necessary for the purpose and can be permitted only when no alternative upland location exists.

For purposes of the BCDC, "fill" is defined as the placement of any material in or over the water surface. As interpreted by BCDC, and on the advice of the Attorney General, fill includes not only placement of new piles or pile-supported structures, but any improvement or repair to existing piles or pile-supported structures which extends the life of the structure.

San Francisco Bay Plan and McAteer-Petris Act

Comment

Under the McAteer-Petris Act, the Commission can approve fill in its Bay jurisdiction only if the public benefits from the fill clearly exceed public detriment from the loss of the water areas and only if the proposed fill meets all of the following criteria: (1) the fill is for a water-oriented use or is a minor amount of fill for improving shoreline appearance or public access to the Bay; (2) there is no alternative upland location available for the use proposed on fill; (3) the fill is the minimum necessary; and (4) the fill would be designed to minimize harmful effects on the volume, surface area, water quality and fish and wildlife resources of the Bay, among other things.

As currently proposed, the project would involve fill in the Commission's "Bay" jurisdiction for the ferry dock, the optional breakwater, sections of the public promenade along China Basin Channel, construction barges temporarily moored along the project site, and repairs to the seawall. The Draft EIR also lists construction of various bridges over China Basin Channel as a potential mitigation measure for the traffic routing plan. The staff believes that all of these proposed and potential uses on fill are uses for which the Commission may authorize fill. However, before the Commission will be able to determine whether any of these proposed fills meet the other criteria of the McAteer-Petris Act (i.e., no alternative upland location, minimum fill necessary, minimal impacts on Bay natural resources, etc.), additional information must be provided for each of the uses for which fill is proposed. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

The commentor is correct. Information is provided on the specific topics in other responses to BCDC's comments. In addition, the information required by BCDC will be submitted to BCDC as part of the application for BCDC approval of the project. The project will make every attempt to meet the BCDC criteria.

San Francisco Waterfront Special Area Plan

Comment

In addition to the *San Francisco Bay Plan* and the *San Francisco Waterfront Special Area Plan*, the project must be consistent with the *Bay Area Seaport Plan*. The seaport plan reserves approximately six acres of one of the areas slated to accommodate parking in the DEIR adjacent to Pier 48, as a marine terminal for shipping neo-bulk. The Seaport Plan

allows "non-port uses such as public access and commercial recreation development ...provided that the use would not impair existing or future use of the area for port purposes. Uses that would impair the future use of a port priority use area that is not currently used for port purposes may be allowed only on a finite, interim basis. Interim uses should be of a nature that allows the site to be converted to port use when it is needed for marine terminal development or other port priority use. The length of the interim use period should be determined on a case-by-case basis for each site and proposed uses. Factors to be considered in determining the length of the interim use should include, but are not limited to: (1) the amortization period of investments associated with the proposed uses; (2) the lead time necessary to convert the site to the designated marine terminal or port use; and (3) the need for the site as measured by the Bay Area volume of the cargo type specified to be handled at that site and the available capacity at other Ports in the Bay Area to accept the specified cargo." The final EIR should address what improvements are proposed for the parking area within the port priority designated site and the parking lot's consistency with the policies of the *Bay Area Seaport Plan.* (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

The parking facilities south of the China Basin Channel are proposed for use on an interim basis. See EIR p. II.19. Moreover, parking can be considered an interim use for purposes of the Seaport Plan. Improvements necessary to provide parking are fairly minimal and could include drainage, grading, lighting, landscaping, and paving. All of these improvements are reversible in the event that the site becomes useful as a marine terminal or other port priority use.

State Lands Commission

Comment

At page I.9 of the Summary the document states that a portion of the project is currently within the jurisdiction of the California State Lands Commission. The project site consists of lands, which are either currently or will be after Port acquisition of the Caltrans property, administered by the City and County of San Francisco, through its Port, pursuant to Chapter 1333 of the Statutes of 1968, as amended, commonly referred to as the "Burton Act." The role of the SLC is in an oversight capacity to review compliance with the public trust and the Burton Act.

In Section III (A), Consistency with Existing Plans and Policies, the document states that the nature and extent of sovereign interests with the project area, if any, have not yet been fully

determined. Staff believes that the extent of public trust lands within the project site are known. The public trust applies to current Burton Act lands and will apply, pursuant to Chapter 11 of the Statutes of 1984, to the Caltrans parcel when acquired by the Port. (Dave Plummer, Public Land Manager, California State Lands Commission)

Response

The commentor is correct. The text in the EIR, beginning with the last paragraph on p. I.9 and continuing to p. I.10, has been amended as follows:

> **The portion of the project site south of the Berry Street right-of-way including Pier 46B ~~is currently within the jurisdiction of the California State Lands Commission (SLC), and is subject to public trust restrictions~~ consists of lands which are administered by the City and County of San Francisco, through its Port, pursuant to Chapter 1333 of the Statutes of 1968, as amended, commonly referred to as the Burton Act. The Port's acquisition of the Caltrans property to the north of Berry Street ~~by the Port would; pursuant~~ will also subject that property to the Burton Act. ~~place the entire site within the purview of the public trust doctrine. The SLC would review the proposed ground lease and uses at the site to determine the compatibility of the proposed use with public trust policies.~~ The public trust applies to current Burton Act lands and will apply, pursuant to Chapter 11 of the statutes of 1984, to the Caltrans property lands when acquired by the Port. The State Lands Commission will have a role in an oversight capacity, to review compliance with the public trust restrictions and the Burton Act.**

Comment

Section IV.16 states "A portion of the site is subject to the public trust and may only be developed with uses that are consistent with the public trust." This should read "...consistent with the public trust and the Burton Act." While the text mentions the need for the ballpark to be "part of a larger development scheme of mixed uses along the waterfront geared to bring the public to the area," the document does not expand on how the ballpark will be integrated with the surrounding uses to accomplish this goal. (Dave Plummer, Public Land Manager, California State Lands Commission)

Response

The commentor is correct. The first sentence on p. IV.16 of the EIR has been revised as follows:

> **A portion of the site is subject to the public trust and may only be developed with uses that are consistent with the public trust and the Burton Act.**

LAND USE

Demolition Square Footage

Comment

Page IV.25 Demolition square footage is 427,000 sq. feet. Table IV.B.1 gives gross floor area of buildings to be demolished at 513,129 square feet. Which is correct? There are other earlier references to space to be demolished, which also differ from these two figures. (Rincon Point South Beach CAC)

Response

The commentor asks about a seeming discrepancy between the amounts given for the total floor area to be demolished on the project site. Pages I.5, II.23, and IV.25 of the EIR state that a total of 427,000 sq. ft. would be demolished for the construction of the project. The Land Use Setting and Impacts sections, p. III.26 and Table IV.B.1, p. IV.18, state that total demolition would be about 513,129 sq. ft. The numbers given in the Land Use sections include about 86,000 sq. ft. of auto ramp and open parking area on the second floor of the Pier 46B building that is not called out in the other citations. All floor areas given are approximate.

The EIR has been revised as follows to clarify that the auto ramp and roof parking are in addition to the stated floor area:

On p. III.26, the second full sentence of the third full paragraph has been revised as follows:

> **The three Port buildings, one- and two-story structures, include about ~~402,000~~ 316,000 sq. ft. of floor area, plus about 86,000 sq. ft. of auto ramp and roof parking (open area).**

Table IV.B.1, on p. IV.18, has been revised as follows, with changes shown in italics:

TABLE IV.B.1: BUILDINGS TO BE DEMOLISHED (Revised)

Assessor's Block	Height (Stories)	Gross Floor Area (sq. ft.)
Block 3794[1]		
860 Second St.	2	23,000
30 Berry St.	1	10,000
36 Berry St.	1	5,500
40 Berry St.	1	3,300
44 Berry St.	2	14,200
66 Berry St.[2]	2	30,000
50 Berry St.	2	10,300
70 Berry St.	1	15,000
Block 9900		
Pier 46B	2	*204,300*[3]
Pier 46C	2	*100,300*
95 Berry St.	1	*11,100*
Total Floor Area (sq. ft.)		***427,000***[3]

Notes:
1. Floor areas are approximate for the Caltrans property.
2. Partial second story.
3. *Plus about 86,000 sq. ft. of* auto ramp and roof parking (open area).

Source: Paul Osmundson, Director of Planning, Port of San Francisco, February 1997.

On p. IV.25, the second full paragraph has been revised as follows:

> **Eleven buildings on the project site containing about 427,000 square feet (sq. ft.) of space plus about 86,000 sq. ft. of auto ramp and roof parking would be removed prior to ballpark construction.**

Location of Service Drive Access

Comment

[Page] IV.20: Add the access driveway to the east of the 2nd Street right of way as a use in the public park. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The shared access driveway would not extend into South Beach Park. The driveway would be constructed immediately east of the Second Street right-of-way, which is currently a landscaped parking lot. The EIR, p. IV.24, discusses the configuration of the shared service drive to access both the ballpark internal parking component and the Redevelopment Agency's proposed parking. The following text has been added to the end of the first partial paragraph on p. IV.21:

> **A shared entrance drive to the ballpark's internal parking component, and SFRA parking, would be located immediately to the east of the ballpark.**

Since publication of the EIR, the SFRA is contemplating building a surface parking lot to serve the Harbor rather than placing the parking underground beneath an extension of South Beach Park. If the agency selects the surface parking option, South Beach Park would not be extended to the south adjacent to the ballpark. In either case, the proposed parking would be accessed by the shared drive.

Characterization of Land Uses

Comments

It should be noted, that prior to this Environmental Impact Report being undertaken it is a matter of record that Urban West Associates of San Diego had entered into an Owners Participation Agreement with the San Francisco Redevelopment Agency. I underscore this information inasmuch as the scope and scale of pending Site L development existed then as a "known" component of the neighborhood yet is treated in the EIR on an incomplete basis. Figure III.B.1 indicates Site L land use as parking; strongly suggesting that Site L parking is a part of the parking inventory page III.97 figures. Section IV.22 describes Site L as

designated for residential development. An accurate representation would have stated approved for development of 233 residential units comprising two towers at height and proximity to the proposed project to provide direct view of the infield of the ballpark to many upper units. Site L is the most impacted residential project within the neighborhood. (Michael Kriozere, Urban West Associates of San Diego)

I was very disappointed in the EIR's utter failure to acknowledge residential use of the immediate area surrounding the ballpark site... (Aidan Costello, Community Awareness Committee, 355 Bryant Homeowners Association)

[I]n particular the neighborhood has been characterized as light industrial and commercial area, which I believe is false. It is a large, vibrant residential neighborhood. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Fig. III.A.1, Land Use Districts: The land use map of the Rincon Point-South Beach Redevelopment Plan Area must be incorporated into the land use districts map. It is completely inaccurate to indicate that the entire redevelopment district has a land use designation of M-2 (heavy manufacturing), since the primary land use designation under the redevelopment plan is residential. (Steven L. Vettel, Residential Properties Group)

Fig. III.A.2, Height and Bulk Districts: The height and bulk district map of the Rincon Point-South Beach Redevelopment Plan Design for Development must be incorporated into the height and bulk districts map. It is completely inaccurate to indicate that the entire redevelopment district has a height and bulk designation of 105-F, since the height limits in the redevelopment area range from 24 feet to 160 feet. (Steven L. Vettel, Residential Properties Group)

Fig. III.B.1, Land Uses: The land use map substantially misrepresents the extent of residential development in the vicinity of the ballpark. It appears to be only a ground floor land use map, which is misleading, since most residential development in the area is above the ground floor. For example, the South Park area (which is a mixed residential/ commercial area) shows no residential land uses. Also missing is the 220 unit Portside residential project on Main Street between Bryant and Harrison (62 units completed in 1994, 158 units to be completed in early 1998)...Fig. III.B.1, Land Uses: The land use map (or a separate map) should also designate approved residential structures that are likely to be completed by the year 2000, including Two Embarcadero South (NE corner of King and Second) (233 units) [One Embarcadero South], Reliance Development Corporation's Oriental Warehouse Phase II (356 units), Site D SRO project (NW corner of Bryant and Beale) (216 units) and proposed residential structures that probably will be completed in the years 2000-2005 (such as Mission Bay North, the Gallo Salami site at NW corner of Brannan and Delancey Street, and the former Bouncers site at Townsend and Colin P. Kelly)...Page III.30, Land Uses: The text should also describe approved but not yet built residential projects east of Second Street (Two Embarcadero South, Reliance, Site D SRO), and proposed and likely to be built residential projects (for example, Gallo Salami site). The

Draft EIR does discuss proposed development in the Mission Bay North area (page III.33), and to be consistent should do so for the area east of Second Street. Page III.33, Mission Bay North: Include a proposed site plan for Mission Bay North, showing residential and commercial land uses. (Steven L. Vettel, Residential Properties Group)

Page IV.21, Project vicinity: The discussion of the increase of residential uses in the project area needs to be more specific and describe all the proposed new residential development and their number of units, including Two Embarcadero South, Reliance, Gallo Salami site, Site H, Sites F-1 (38 units) and Site F-2 (16 units), Site D, Mission Bay North, and Portside Phase II (158 units). Only Two Embarcadero South and Mission Bay North are included in the discussion, without unit counts. Page IV.22, Pedestrian Activity: The zoning in the area is not predominantly light industrial to the east and northeast. The M-2 zoning has been superseded by the predominantly residential land use designations in the Rincon Point-South Beach Redevelopment Area Plan. Page IV.22, Rincon Point - South Beach: A change in land uses in the Rincon Point - South Beach Redevelopment Project Area, from predominantly multi-family residential uses to a commercial center, would have a significant adverse impact on this existing residential neighborhood. Extensive commercial development on the blocks and piers directly adjoining the project area could also have an adverse impact and should be analyzed. Page IV.22: The residential land uses could be significantly impacted by loud and disorderly pedestrian activity, crime and security, graffiti, litter, and other neighborhood impacts, particularly after evening baseball and concert events and particularly since a significant portion of the project parking will be east and northeast of the project site, and thus pedestrian activity will increase in the residential areas before and after games as people travel between their vehicles and the ballpark. The Draft EIR contains no analysis of these potential environmental impact, which must be considered during the approval process.

If these issues are not considered CEQA issues, they must be analyzed in some alternative study before the approval process can commence. For example, a Ballpark Neighborhood Influence Study was prepared for Coors Field in Denver which included analysis of pedestrian conduct, street clean-up, and storm drainage facilities, as well as traditional CEQA-type physical impacts. (Steven L. Vettel, Residential Properties Group)

Page III.39, Rincon Point-South Beach: Include number of proposed but not yet built residential units in Plan Area. (Steven L. Vettel, Residential Properties Group)

One of the main things I wanted to address today is the characterization of our neighborhood. Our neighborhood has over 5100 residential units which are either completed, in planning, or in construction. This will house over 12,000 residents, all within four blocks of this ballpark. This is a residential neighborhood, and needs to be treated as such... in the DEIR. We need to try to protect the residential quality of this neighborhood in conjunction with having the ballpark sitting right next to it. (Richard Dickerson, South Beach Marina Apartments)

Well, I guess the Giants won - the city too maybe. This was a great neighborhood - craftspeople, artists, etc. etc. [plus] people who actually live here. Things have changed quite a bit in this area - traffic - you can say that twice and mean it. [Plus] parking - it's almost as bad as North Beach. It's too late to go backwards. (Mark Erickson, Mark Erickson Studio)

I would ask that the rewrite of the report place emphasis on South of Market as a neighborhood. (Elizabeth Carney)

Response

The commentors are concerned that the residential character of the project vicinity, including approved and proposed residential projects, is not adequately considered in the EIR analysis; and that the residential emphasis of the Rincon Point - South Beach Redevelopment Project Area is not accurately depicted. Land use surveys for this project were conducted in April, August and November 1996. The general residential character of the project vicinity is established on p. III.30 of the EIR, which states "decline of maritime activity...has induced a shift...to residential and land-oriented commercial activities west of The Embarcadero." The EIR, on p. III.31, characterizes the "North of Townsend Street" area as "small-scale commercial, industrial, and office, with pockets of residential..." The presence of the South Park neighborhood is noted in the discussion in the "North of Townsend Street" discussion on p. III.32. In the "North of Townsend" subsection, South Park is described as "an older area...characterized by small-scale residential buildings with retail, restaurant, residential and mixed uses." The land use survey conducted for the EIR, however, found that the precise residential character of South Park is not evident from outside observation. Live/work units are plentiful in this area and in the South of Market generally. South Park is very busy during the daytime with what appear to be professional working people. It does not have the atmosphere of a residential neighborhood in daytime, but rather the busy ambience of a workplace environment. See Land Use, Live/Work Land Uses for more discussion.

The Land Use section text and graphics show, describe, and analyze among other things, the existence of residential units, a marina and commercial uses that are the constituent parts of the South Beach neighborhood, and analyze these components in the impacts discussion. The South Beach neighborhood is not characterized as light-industrial and commercial. The

discussion includes information about residential development in the South Beach subarea of the Rincon Point - South Beach Redevelopment Project Area. The Land Use map, Figure III.B.1, shows a swath of residential uses following the line of The Embarcadero from Harrison Street south to the project site.

The Land Use Impacts section, pp. IV.21 - IV.23, discusses the planned development of residential uses as articulated in the Rincon Point - South Beach Redevelopment Plan. Potential impacts of the ballpark project are specifically evaluated with respect to the residential community of the area. The commentors are correct that the Land Use section of the EIR refers generally to residential uses in the vicinity but does not callout "South Beach" specifically as a neighborhood in the area adjacent to the site. The Land Use section has been amended with the following text changes for clarity. The following text has been added to the last sentence of the first paragraph under "East of Second Street" on p. III.29:

> **This area includes the South Beach neighborhood which contains a mix of residential and commercial uses as described below.**

The Land Use Setting discussion, pp. III.25 - III.36, under the "East of Second" subsection includes information about the recent (last ten years) residential development in the Rincon Point - South Beach Redevelopment Project Area, including the Steamboat Point Apartments, South Beach Marina Apartments, Bayside Village Apartments, and the Delancey Street Foundation complex. Unit counts are given as well as the intersection location of each complex. Figure III.B.1, Land Uses in the Project Vicinity, shows these areas with a residential screen. The EIR distinguishes between ground-level use and upper-floor use. Those parts of the complexes as well as other areas in the project vicinity that have ground-floor commercial uses with upper-floor residential use are designated by an "R" over a blank screen.

The EIR did not include One Embarcadero South, an approved residential project referred to as "Site L" (northeast corner of King and Second Streets) in the parking inventory on p. III.97. Urban West, owners of One Embarcadero South, has recently entered into an

Owners Participation Agreement with the SFRA. Impacts on proposed One Embarcadero South are discussed in Noise, pp. IV.254 - IV.261. The site is identified for noise measurements as Location F on Figure IV.F.2, p. IV.253, and in Table IV.F.5.

In order to respond to the comment that "proposed residential projects be indicated on the land use map," Figure III.B.1, p. III.27, has been amended as shown on the following page, to indicate with an asterisk (*) with the legend "Approved Residential Projects" the following approved residential developments in the project vicinity: One Embarcadero South (Site L) at the northeast corner of King and Second (233 units) referred to in the comments as "Two Embarcadero South"; Oriental Warehouse Phase II along Brannan Street between Colin P. Kelly Jr. and Delancey Streets (356 units); Site F-1 at Brannan and Delancey Street; and Site F-2 at Federal and Delancey Street.[2]

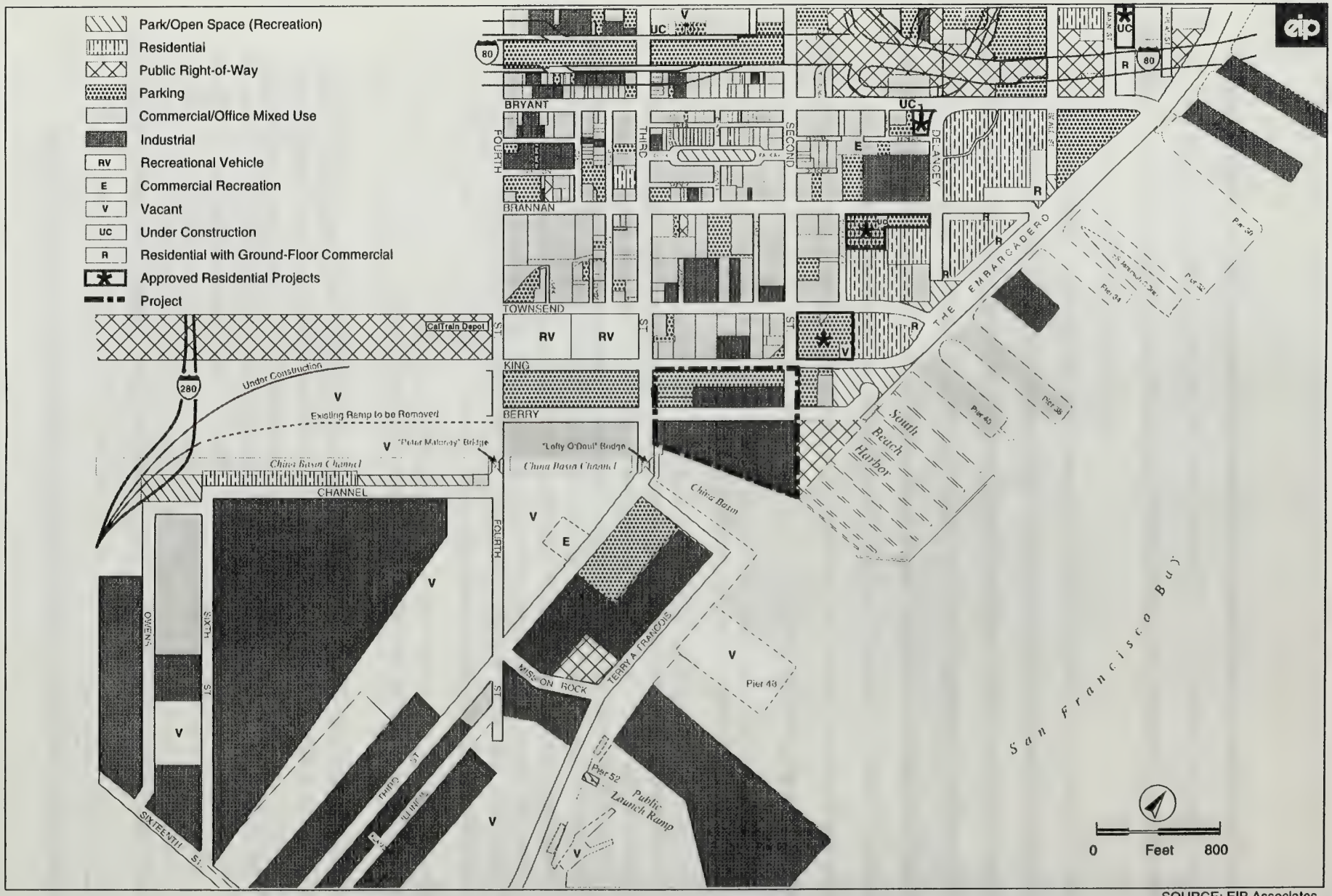
On p. III.31, the following text has been added at the end of the first partial paragraph:

> **Additional residential projects approved for construction in the South Beach subarea include: One Embarcadero South (Site L) at the northeast corner of King and Second Streets (233 units); Oriental Warehouse Phase II along Brannan Street between Colin P. Kelly Jr. and Delancey Streets (356 units); Site F-1 at Brannan and Delancey Streets; and Site F-2 at Federal and Delancey Streets. Portside Phase II is an approved residential project located at the intersection of Harrison and Main Streets (158 units). Each of these is indicated on Figure III.B.1, p. III.27, with an asterisk.**

On p. IV.21, the last partial paragraph has been revised as follows:

> **Residential uses are expected to increase in the project area. Diagonally across from the project site at the King and Second Streets intersection is a parking lot ~~in an SFRA redevelopment project area designated~~ with two vacant buildings in the *Rincon Point - South Beach Redevelopment Plan* area approved for residential development. Elsewhere in the Rincon Point - South Beach Redevelopment Area, other approved residential projects include: Oriental Warehouse Phase II along Brannan Street between Colin P. Kelly Jr. and Delancey Streets (356 units); Site F-1 at Brannan and Delancey Street; and Site F-2 at Federal and Delancey Street.**

2. Michael Kaplan, Senior Project Manager, San Francisco Redevelopment Agency, May 8, 1997.



SOURCE: EIP Associates

GIANTS BALLPARK

Figure III.B.1 (Revised) Land Use In Project Vicinity

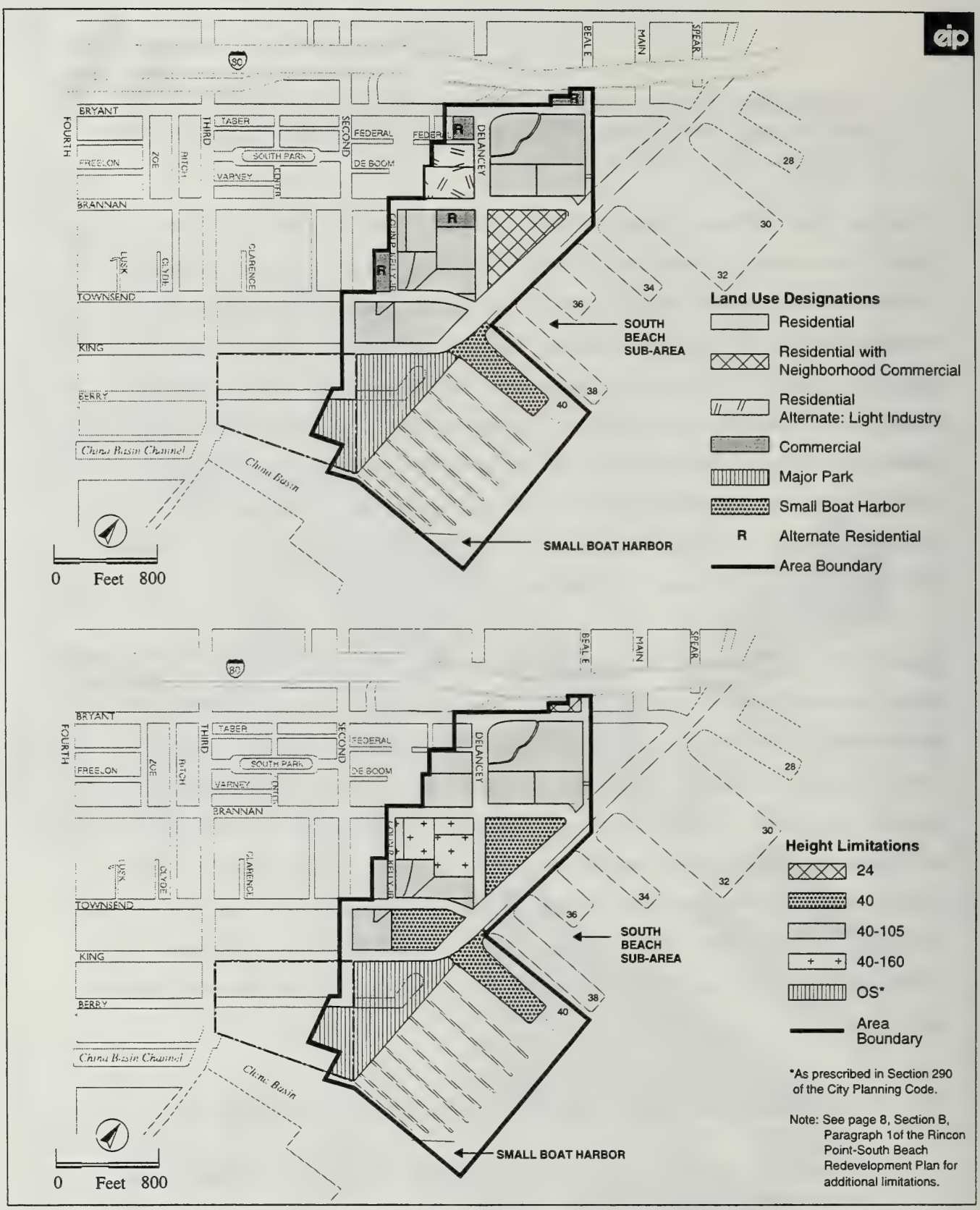
Portside Phase II is an approved residential project located at the intersection of Harrison and Main Streets (158 units). Each of these is indicated on Figure III.B.1, p. III.27, with an asterisk.

A portion of the 220-unit Portside residential project is correctly shown on Figure III.B.1 as "under construction;" the southern portion of the site has been re-screened to indicate "residential with ground-floor commercial." As of this writing, a residential project proposed for "Site D" (northwest corner of Bryant and Beale) is in review but has not been approved for development and is correctly indicated on the Land Use map as parking.[1] No residential projects have been approved for the sites listed by the commentors as the Gallo Salami site, the former Bouncers site, Site H, and Mission Bay North. Mission Bay North, west of Third Street and north of the Channel, is discussed in the EIR on p. III.33. Proposed projects, including Mission Bay North, are speculative at this time and do not necessitate separate site plans in the Ballpark EIR.

Figures III.A.1 and III.A.2, pp. III.13 and III.14, respectively, show the boundaries of the existing Redevelopment Area. A new figure, Figure III.A.4 "Rincon Point - South Beach Redevelopment Project Area Land Use Designations and Height and Bulk Districts" has been added to the Consistency With Plans and Policies Setting, p. III.18a of the EIR, see next page for this figure. This figure will complement the figures which illustrate the land uses and height and bulk districts of the Planning Code. As noted by the commentor, the Redevelopment Area land use designations supersede the Planning Code land use districts for the life of a redevelopment plan. The Rincon Point - South Beach Redevelopment Project sunsets in 2021. See Land Use, Live/Work Land Uses for discussion about the proper use designation.

On p. III.18, the following text has been added to the end of the first paragraph:

The land use designations and height and bulk districts of the South Beach Subarea are presented in Figure III.A.4.



SOURCE: San Francisco Redevelopment Agency

GIANTS BALLPARK

Figure III.A.4 (New) Rincon Point - South Beach Redevelopment Plan Area Land Use Designations and Height Limitations

On p. IV.22, the last partial paragraph has been revised as follows:

> **...The ~~zoning~~ land uses in the area ~~is~~ are a mix of uses (predominantly ~~light industrial~~ multi-family residential and neighborhood-serving and other commercial to the east and northeast, South of Market uses to the north and Mission Bay ~~uses~~ to the west) and includes ~~M-1 and~~ M-2 zoning immediately to the north of the site, which allows for the concentration of light-industrial and warehouse use.**

Impacts from "extensive commercial development on the blocks and piers directly adjoining the project area" is discussed in the Growth Inducement section, pp. IV.331 - IV.334. The Growth Inducement section cross-references the EIR discussion of litter effects, pp. IV.327 - IV.328, and noise effects, pp. IV.237 - IV.263.

The commentor requests that the concerns of the South of Market neighborhood be taken into account in the EIR. The South of Market area is discussed on p. III.32. It would not be accurate, as the commentor suggests, to characterize the South of Market as a residential neighborhood. The South of Market includes, as stated on p. III.32, "office, outlet retail, restaurant/club, residential, and commercial uses in converted industrial buildings."

See the Initial Study, Community Services, for information regarding community services impacts such as crime, graffiti and disorderly pedestrian activity. See Land Use, Neighborhood Effects/Quality of Life in this section.

Comments

Well, here is the land use map, and there is another one over there. It doesn't even delineate the harbor. So, I think that was missed. The harbor is there, but it does not -- it is not identified under land use, which is where I was promised the harbor would be examined. (L. Joseph Boss)

The Harbor is not delineated on the Land Use map. (Figure III.B.1) (L. Joseph Boss)

Page III.29, South Beach Park: Include a site plan of the park (as expanded) and yacht harbor. (Steven L. Vettel, Residential Properties Group)

Figure III.B.1.: The harbor and marina should be delineated on the map. Also the current parking for the marina. Sailing Ship restaurant is missing. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The commentors ask that South Beach Park, South Beach Harbor and parking, and the Sailing Ship restaurant all be reflected in Figure III.B.1 "Land Use in Project Vicinity" (see Figure III.B.1). Figure III.B.1, p. III.27, of the EIR shows the current park; the harbor is also shown, and has been amended to add the words "South Beach Harbor" over the harbor diagram which is immediately east of the project site. The Sailing Ship restaurant has been added as a small oval of commercial use directly adjacent to the South Beach Harbor. The current parking for South Beach Harbor is correctly indicated on the Land Use figure; it is on the triangular area denoted "public right-of-way" immediately adjacent to the harbor (a small portion of this area will be amended to designate the Sailing Ship restaurant). Other parking along Berry Street as it continues to a circular terminus just to the north of the Sailing Ship restaurant is on-street parking. On-street parking is not called out on the Land Use figure. Note that the land use category "Rail/Public Right-of-Way" has been amended to "Public Right of Way" on Figure III.B.1.

South Beach Harbor is discussed in the Land Use Setting section, pp. III.29 - III.30 of the EIR; South Beach Park is discussed on p. III.29. The proposed expansion of the park is discussed in the EIR on p. IV.24. The SFRA is currently contemplating a number of options in lieu of expansion of the park; see Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension.

Live/Work Land Uses

Comments

Page III.27, The Land Use Map (III.B.1.) grossly understates the extent of residential use in the area. Live work units as a use category should be identified, since these units practically function as residential units and should be recognized as such in impact analysis. One could

argue that live work units are even more sensitive receptors of environmental impacts because people occupy these units on almost a 24-hour basis, as opposed to traditional residential units where people leave to go to work somewhere else. (Rincon Point South Beach CAC)

Live/work land uses, which will be impacted by the ballpark in a similar manner as residential land uses, are indicated on the land use map as commercial/office uses, which is misleading. They should either be designated as residential uses or have a separate live/work land use designation on the map. (Steven L. Vettel, Residential Properties Group)

Response

The commentors request that live/work units be referred to, and designated as, residential uses on the Land Use map. Live/work units are considered to be a commercial, not a residential use in the City Planning Code. As discussed in the EIR, p. III.31, residential units located alongside commercial operations, typically on the floors above, are often not evident from outside observation. The Clocktower Lofts at 461 Second Street is an example of a large live/work development. Live/work units in South Park, by contrast, exist in small residential buildings where address nameplates often obscure the buildings primary purpose. Live/work units are limited to certain types of occupancies/activities depending upon the zoning district the unit is located in: those units outside of the South of Market districts are limited to primary occupancies by artists engaged in arts activities as defined in Planning Code Section 102.2; South of Market SPD, RSD, SLR, SLI and SSO Districts allow live/work units for any activity permitted within the specific zoning district. The Service/Secondary Office (SSO) District allows the widest range of live/work occupancies and includes office live/work units.

The commentor suggests that one could consider live/work units 24-hour residences; however, under the Planning Code it would be appropriate to say that live/work units are a 24-hour workplace, in that the workday and attendant work noise are not limited to customary "business hours."

Project Vicinity Land Use Districts

Comment

Page III.12. Mid page. The zoning directly north of the project site is M-2 (Heavy Industrial) not M-1. This is also the case for the China Basin Building site. (Rincon Point South Beach CAC)

Response

The commentor is correct in pointing out that Block 3794 directly north of the project site bounded by Townsend, Second, King, and Third Streets, is zoned M-2 in the City Planning Code; Block 3795, site of the China Basin and China Basin Landing Buildings, is also zoned M-2. See Growth Inducement, M-2 Zoning in Project Vicinity, for further discussion about allowable uses on these blocks.

The second sentence of the third paragraph on p. III.12 has been revised as follows:

> **The area directly north of the project site is in the ~~M-1 (Light Industrial)~~ M-2 (Heavy Industrial) District.**

Comment

Page III.12, third from last line - The area to the east of the project is in the 40-X Height and Bulk District, not 105-F. (Rincon Point South Beach CAC)

Response

The commentor is correct in pointing out that the area to the east of the project site is in a 40-X Height and Bulk District as shown in Figure III.A.2, III.14. The second sentence of the last paragraph on p. III.12 has been revised as follows:

> **The area to the east of the project site is in the ~~105-F Height and Bulk~~ 40-X Height and Bulk District.**

Project Impacts on Commercial Uses

Comment

The DEIR's discussion fails to recognize and discuss impacts upon non-residential uses in the South Beach neighborhood, such uses consisting primarily of commercial retail operations, which would be affected in ways different from the residents of the neighborhood. (Douglas G. Wright)

The madhouse situation will adversely affect the residential neighborhood and prevent small businesses from operating (Joel Ventresca)

Response

The commentor asks that the project impacts upon existing commercial retail uses be examined. The EIR, pp. IV.330 - IV.334, discusses how the proposed project directly or indirectly might induce growth and the effects associated with that development. Pages IV.331 - IV.333 address the "additional demand for restaurants, bars and retail establishments" that the project would foster. As stated in the EIR, p. IV.333, "The neighborhood-serving establishments north of the project site could encounter a tighter market for commercial space as demand for ground-level space intensifies, with attendant pressure on rental rates...[D]evelopment... in the South of Channel area [is uncertain]... since pedestrian access is minimal and...portions of that area... are planned for cargo-related maritime use and interim dedicated parking to serve the ballpark." See the EIR, p. IV.144, third paragraph and Transportation and Circulation, Traffic Impacts, *South of Channel Area* for a discussion of ballpark traffic and its effects on local intersections and access.

Land Use Impacts on Mission Creek Marina

Comments

The DEIR lacks completeness in that it does not examine the impacts South of the Channel: There is scant acknowledgment in the section on setting (land use I.11, III.35-36) of the residential neighborhood at Mission Creek, and none of the businesses on Sixth Street. (Philip De Andrade, delegate of Mission Creek Harbor Association)

Slighting Neighborhood Impacts: The DEIR lacks completeness in that it does not examine the impacts South of the Channel. There is scant acknowledgment in the section on setting (land use I.11, III.35-36) of the residential neighborhood at Mission Creek, and none of the businesses on Sixth Street. (Philip DeAndrade, Mission Creek Harbor Association)

Response

The commentor requests that the houseboat community in China Basin Channel and the businesses on Sixth Street be acknowledged. Figure III.B.1, p. III.27, shows as residential the China Basin Channel at the location of the houseboats and pleasure craft and also shows both industrial and commercial uses along Sixth Street south of the Channel. Page III.34 states "Houseboats and pleasure craft are moored along the south side of China Basin Channel, west of the Peter Maloney Bridge." The "South of Channel" subsection, p. III.34, describes "warehouse facilities... clustered... along Sixth Street and Owens Street." Impacts due to the use of the Third Street Bridge are discussed on pp. IV.156 - IV.158. Other impacts such as noise, lighting and pedestrian traffic would not be as severe in this area because Sixth Street and the houseboat community would be removed from the immediate project vicinity and away from major arterials serving ballpark traffic. Additional information about traffic impacts in the South of Channel are provided on pp. V.33 - V.34 of the EIR where the effects of use of Terry A. Francois Blvd. in a traffic routing mitigation program are discussed in Transportation, Parking, *South of Channel Area* and in Transportation, Traffic Impacts, *South of Channel Area.*

Land Use Impacts on South of Channel Uses

Comments

We know that the Giants organization, which promotes recreation and which exists because of recreation, will be dedicated to maximizing open space for recreation in this fast-growing residential area, which includes, of course, Mission Bay as well as South Beach. Therefore, we propose that no parking be allowed on the north half of the Mission Bay side designated as open spac[e] -- that is immediately south of the channel. In addition, the proposed variant on Pier 50 is unacceptable for parking. Pier 50 should be retained for maritime. (Jane Morrison)

(III.A2) The proposed parking garage is on land that is designated "open space" and violates the Mission Bay specific plan by putting in a parking garage. Furthermore, this is an abomination! Land adjacent to the bay is prime land and must remain open. Use of this land should be open space and promenade. Parking garages, no matter the architectural design, are a blight and increase air pollution in the area where they are situated. (Mariuccia Iaconi)

[W]e are not happy about using area zoned as open space for parking. The only way we find that would be acceptable is if the money that Catellus generated by leasing the site to the Giants were dedicated to creating that open space at the time -- at the point in time when it was no longer used for interim parking. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Response

As stated on p. II.19 of the EIR, the parking plan calls for about 5,000 interim dedicated parking spaces south of the channel. The approximate locations of the parking areas are indicated on Figure II.D.5, p. II.20. Catellus Corporation and the Port of San Francisco, property owners of those areas, and the Giants are currently negotiating the exact location of interim parking for the ballpark. Interim parking would not involve the construction of a parking garage. The EIR, p. II.19, describes the parking lots which would involve: surface treatments, some sidewalks and curbs in high-volume pedestrian areas, fencing and lighting.

The location of permanent parking would occur in conjunction with the replanning of the Mission Bay South of Channel area, as described on p. II.21. The potential parking areas that are designated in the Mission Bay Specific Plan as "open space" could not be developed with permanent structured parking unless and until the land use designation were amended. That process would undergo separate environmental review.

The Increased Dedicated Parking Variant, pp. VII.17 - VII.25, of the EIR analyzes the project with additional parking located on Port-owned property, including Pier 50. This variant would be available to decision-makers as one way to alleviate parking impacts. Since publication of the EIR, the Port has announced plans to permanently relocated their Maintenance Operations Facility (MOF) to a portion of Pier 50; previously the Port had

intended to use Pier 50 on an interim basis. Therefore, under current Port plans, most of Pier 50 could be available for use as interim parking for the ballpark.

Comments

[T]he initial study contained in volume two of the report, on Page A47,...Question No. 13...addresses disruption and conflict with existing uses. Recreational use is included. In the response to this question, only South Beach Harbor and South Beach Park and its extension are mentioned. There is no mention of existing uses along the China Basin shoreline including the Mariposa Hunter's Point Yacht Club, the Pier 52 public boat launching ramp, the Bay View Boat Club, the Safe Harbor Company on Pier 64, Great American Navigator Company on Pier 64, the public fishing pier off of Terry Francois Boulevard, the Marina behind the Mission Rock Resort, the San Francisco Boatworks, and the small boat yard at Pier 66. (Jeffrey Brown)

[W]e find no mention of the impacts upon these existing uses [along the China Basin shoreline]...anywhere in Volume [O]ne of the EIR. (Jeffrey Brown)

Impact analysis for areas "South of the Channel" is covered very superficially. The maritime nature and impact on maritime uses South of the Channel is not addressed, particularly with respect to access, parking demand, and parking need by residents and waterfront users. (Martin Fay, Rincon Point – South Beach CAC)

I haven't heard anybody speak to any of these issues yet. I'm talking about south of the channel. Have you heard anything about this? Is it anywhere in the EIR? Clearly, it is necessary to reassess the environmental impact of this project upon existing and future maritime uses. Specific places in the report that should be changed include in Volume I, Part I the summary Section B, main environmental effects particularly land use, transportation and circulation, Part 3, environmental setting, consistency, Section A consistency with existing plans, specifically the San Francisco General Plan. (Jeffrey Brown)

If we look at the Initial Study contained in Volume 2 of the D.E.I.R., on page A-47 we find question #13 which addresses disruption and conflict with existing uses - recreational use is included. In the response to this question only South Beach Harbor and South Beach Park (and its extension) are mentioned. There is no mention of existing uses along the China Basin Shoreline: the Mariposa-Hunter's Point Yacht Club, The Public Boat Launching Ramp at Pier 52, the Bayview Boat Club, Intrepid Marine at Pier 64, Great American Navigator Company at Pier 64N, the public fishing pier on Terry Francois Blvd., the marina at the Mission Rock Resort, the San Francisco Boat Works, or the boat yard at Pier 66. I should point out that the aforementioned existing uses along Terry Francois Blvd. are Recreational Maritime uses. They must be located on the waterfront. There are also Commercial Maritime uses on this waterfront including Crowley Marine, seasonal uses by the herring fishing fleet, the Port of San Francisco's maintenance facility, and the shipyard at Pier 70.

There is no consideration of the impacts upon these uses anywhere in the D.E.I.R....The existing Recreational/Maritime and Commercial/Maritime uses along China Basin Shoreline should be included in this report. (Jeffrey Brown)

Clearly it is necessary to re-assess the environmental impact of this project upon existing and future Maritime uses of the China Basin Waterfront. Specific places in the report which should be re-evaluated include: Volume 1, Part I - Summary, Section B - Main Environmental Effects, page 1.10 - Land Use, page 1.17 - Transportation and Circulation; Part III - Environmental Setting, Section A - Consistency with Existing Plans and Policies, San Francisco General Plan, Recreation and Open Space Element, Objective 3, Policy 1, Commerce and Industry Element, Objective 5, Policies 4 and 8, Port of San Francisco Waterfront Land Use Plan, China Basin Shoreline Designated Uses; Fig. III B.1 - (does not show any existing maritime uses); Part IV - Environmental Impacts, All Sections (all assessments must be adjusted to include the new information outlined above) (Jeffrey Brown)

[T]his EIR is grossly inadequate and incomplete in its evaluation of the impacts upon the functional and operational aspects of existing and future maritime uses from Pier 48 south to Pier 70,...the maritime uses south of the channel adjacent to the 40 acres of parking that is proposed as part of this project. (Jeffrey Brown)

Response

This response provides an expanded description of recreational and other uses south of the Channel identified by the commentors and references impact analysis included in the EIR and other responses in this document. Figure III.B.1, p. III.27, has been revised to indicate the Public Launch Ramp at Pier 52. The revised figure is included in this section. The text description has been amended as indicated below. Figure III.B.1 correctly indicates the uses on the waterfront as commercial/office/mixed, vacant, or industrial use: a listing of the individual enterprises is not provided on the Land Use figure for this area or any other area. The EIR text, however, has been amended to include a list of the predominant uses. Land use south of the Channel and along the waterfront is a mix of industrial, marine-oriented businesses and recreational uses. Pier 48 is a cargo warehouse and maintenance facility for ferry boats, vacant since the Loma Prieta earthquake; Pier 50, about 20 acres in size, is a ship repair service facility and cargo warehouse for coffee and the new site for the Port's Maintenance Operations Facility; Pier 50½ uses include the Mariposa Hunters Point Yacht Club and miscellaneous offices; between Piers 52 and 54 is the Bay View Boat Club and the

Public Launch Ramp. Pier 54 is a maritime support facility providing tug and tow services as well as seasonal fishing operations.

Other uses on some of the seawall lots include a paper recycling facility; small offices and warehouses; tour bus parking; and small industrial uses. Some of the businesses provide employee parking, but much of the parking in the area is on-street. In addition to automobile parking, there are often boats on trailers parked in the area. Most of the buildings have small footprints and bulks, with heights of one and two stories. Most are of a warehouse/industrial type design.

Page III.34, third full paragraph and following has been revised as follows:

Facing the project site across ~~the Channel~~ China Basin is the H&H Ship Service Company ~~processing plant~~ recycling and tank cleaning facility, now closed, which handled identified hazardous materials. Since the late 19th century, the South of Channel area has supported warehousing, maritime-related commercial/industrial and rail~~way~~ uses. The South of Channel area is a former rail yard and warehousing district. Large expanses of the area are presently vacant; railroad tracks remain in some areas. The active uses in this area generally consist of warehouse facilities and truck terminals. Nearest the project site, Piers 48 and 50 regularly moor commercial vessels, while the piers farther south handle small-boat services, storage, and loading ramps. Warehouse facilities are clustered along Third Street and Illinois Street and along Sixth Street and Owens Street. The warehouses are typically one to two stories in height.

Houseboats and pleasure craft are moored along the south side of China Basin Channel, west of the Peter Maloney Bridge. Commercial facilities in the South of Channel area include warehouses~~;~~ the Bladium, an in-line skating facility at Third Street and the Channel~~;~~ the Mission Bay Golf Driving Range at Owens and ~~the~~ Channel Street, and various maritime-related yacht and boating clubs along the waterfront.

The South of Channel maritime-related waterfront uses along Terry A. Francois Boulevard include the following enterprises: Mariposa-Hunters Point Yacht Club, Bay View Boat Club, and the Port's Public Launch Ramp at Pier 52. Other uses include a paper recycling facility, small offices and warehouses, tour bus parking, and small industrial uses. Nearby industrial facilities include RMC Lonestar at 420 Mariposa Street and Kaiser Sand & Gravel at 300 Sixteenth Street, both sand and gravel plants. Both sides of Fourth Street, much of the south side of

Channel Street, and the land side of Terry A. Francois Boulevard contain primarily vacant land.

The second full paragraph and following, p. IV.23, of the EIR has been revised as shown:

Parking

Approximately 5,000 dedicated parking spaces for the project are planned in the Mission Bay South of Channel area on lots owned by Catellus Development Corporation and the Port (see Figure II.D.5, Proposed South of Channel Parking Areas, p. II.20). The properties would be leased as an interim use with improvements to surface and lighting conditions. This would create an expanse of paved parking lot use ~~near the waterfront in an area~~ along portions of the Third Street corridor that ~~is~~ are now mostly vacant or occupied by interim industrial uses. The proposed parking areas along Terry A. Francois Boulevard would increase traffic congestion in the area and could delay access to existing maritime commercial and recreational activities. See the discussion on pp. V.6 - V.40 regarding the proposed traffic routing plan and associated effects.

The commercial entertainment/recreation use, the Bladium (a rollerblading rink), would be retained on its site at Third Street, as would Fire Station 30 at the corner of Third and Fourth Streets. Permanent structured parking would be developed by the year 2015 based on the demand experienced and in conjunction with re-planning the South of Channel area.

Auto activity related to the proposed project that could interfere with the recreational uses would occur primarily after weekday afternoon games (from 3:30 - 4:30 p.m.). Traffic from weekend afternoon games would occur when intersections in the project vicinity operate at acceptable levels and there is relatively little delay.

Impacts upon these land uses are discussed in the EIR and additional discussion is provided in this document under Transportation and Circulation, Traffic Impacts, *South of Channel Area*, respectively. The EIR Transportation Mitigation discussion, p. V.7, describes the temporary impacts as a result of any proposed traffic routing plan: inconvenience, out-of-direction travel, and delays. As explained on p. V.12 of the EIR, the preliminary traffic routing plan described is one example of a program to reduce the ballpark's day-of-event traffic congestion.

The provision of parking south of the Channel is discussed under Transportation, Parking, *South of Channel Area Parking*. As discussed in Section A, Introduction, the parking area locations are approximate.

To address the concern regarding the emphasis of land use impacts south of the Channel, the fourth full paragraph, p. I.11, of the EIR has been amended to add the following text:

> **Maritime, recreational and other uses south of the Channel would experience day-of-event impacts, including ~~effects from~~ delays due to increased pedestrian and auto activity.**

The new information provided to expand the discussion of South of Channel land uses does not affect the conclusions of the EIR. Potential effects from the proposed traffic routing plan are discussed in the EIR. As noted at the time, the traffic routing plan is one potential option: the analysis of its effects was meant to provide additional information to decision-makers, and not to determine what the final routing plan would include. See the additional discussion and text revisions under Neighborhood/Quality of Life responses in this section.

Comment

There is NO consideration of the impact of that parking location or the significant traffic increase on current port tenants and waterfront users, including the Bay View Boat Club, the Mariposa/Hunters Point Yacht Club, San Francisco Boatworks, and the Port's new Public Launch Ramp at Pier 52. This project, in planning for years with significant public input, is a $1.9 million investment, partially funded by a Cal Boating Grant, that is in final design stages and has received all necessary approvals. Those users would lose all their parking, and essentially all waterfront access, before and after ballgames (about 50% of weekend days and up to a third of weekday evenings using a 1997 schedule analysis). It should be noted that the April through September baseball season is also the most active boating season on the Bay. The conflict between having four traffic lanes and the Port plan to narrow part of Terry Francois Blvd. by one lane in front of the new public launch ramp (so it's safer for trailered boats to turn in to the launch ramp) isn't addressed. (Corinne W. Woods, Secretary, Bay View Boat Club)

There is no consideration of the impact of this traffic and parking use on the Port's new Waterfront Land Use plan. The Port (based on comments from Diane Oshima) appears to be holding up detailed plans for development of the China Basin/Mission Bay Waterfront area pending resolution of questions about the ballpark and Mission Bay. It is inappropriate to

defer decisions of waterfront land use planning pending resolution of problems caused by a non-maritime use in a waterfront location, particularly when the impacts of the non-maritime use are so detrimental to existing and future maritime uses, including the Port's own use of Pier 48 for Port maintenance facilities. (Corinne W. Woods, Secretary, Bay View Boat Club)

In October of 1995, I was asked to serve on a citizens advisory committee to guide the Port of San Francisco's development of the Pier 52 public boat launching ramp. The basic components of the project are a launching ramp, a cafe with a bait and tackle shop, public shoreline access, and a parking lot for boat trailers. This project has been -- has secured funding -- it has secured funding from the Cal Department of Boating and Waterways, the Port of San Francisco. It totals $1.6 million for this project.

The project has been approved by BCDC, including an amendment to the San Francisco special area plan, and the program changed to the plan has received federal concurrence from the Office of Ocean and Coastal Resource Management.

The Port even held a meeting with PG&E and port tenants to discuss undergrounding of utilities for this project. And here is a set of plans produced by architects hired by the Port to do this project.

I personally have been told by personnel at the Port that this project is now on hold until after the EIR for the ballpark is resolved. So not only does the ballpark impact this project, but the EIR process impacts this project. (Jeffrey Brown)

Response

The Port's *Draft Waterfront Land Use Plan* (WLUP) is discussed on pp. IV.12 - IV.13 of the EIR. The WLUP is not final and thus would not apply to the ballpark project, unless adopted by the Port Commission before approval of the ballpark. However, the WLUP identified a stadium or sports facility as an acceptable use, contingent on certain findings. The traffic and parking impacts of the ballpark routing plan on existing uses along Terry A. Francois Boulevard, are discussed on pp. V.33 - V.34 of the EIR and in Transportation, Parking, *South of Channel Area* and in Transportation, Traffic Impacts, *South of Channel Area.*

The Port of San Francisco is currently designing public improvements to the Public Boat Launch Ramp at Pier 52. These improvements include: double boat ramp and maneuvering area meeting State of California Boating and Waterways Design standards; a disability

accessible gangway; a 2,100 sq. ft. cafe; public access and landscape improvements; and a 20-vehicle/trailer-space parking lot on the west side of Terry A. Francois Boulevard. The commentor suggests that the Port has delayed decision making until the ballpark and potential Mission Bay development questions are resolved. The Port's decision to defer further work on the Pier 52 Public Launch Ramp improvements has been because of internal financial considerations.[3] The Port stopped design work February 11, 1997 due to projected cost overruns. On April 22, Port staff reported to the Port Commission that a proposed cafe and dining deck would not be developed and that the other improvement elements would proceed as planned. As reported to the Commission on May 13, Port staff are currently contemplating moving the Pier 52 curbline back 8 ft. to accommodate future uses such as parallel parking or bike lands along this area of the waterfront. This latest change has caused a delay in the continuation of design work. The Port expects to proceed with the public launch ramp improvements as soon as this issue is resolved.

Land Use Impacts on South Beach Park and South Beach Harbor

Comments

It is critical that the DEIR, and that the ballpark project in general, address the impact on South Beach Harbor. It is a facility which required substantial expenditure of funds by the Redevelopment Agency, and which can be profitable (if at all) only if it continues to exist as a viable boating destination. In its present form, the draft barely mentions the harbor's existence, and clearly contemplates nothing effective to mitigate the significant impact which will occur. (Doug Gooding, CAC member)

As the marina is a water-oriented use approved by the Commission with attractive public access amenities that were required by the Commission in its approval of the project, it can be anticipated that these concerns will be raised when the Commission considers the project. Therefore, the final EIR should address these potential impacts on the marina so that the Commission may properly evaluate them in their deliberation on the ballpark. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

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3. Memorandum from Kari Kilstrom, Planner, Port of San Francisco to Jim McCormick, Office of Environmental Review, May 15, 1997.

Clearly access to the marina, noise, wind, shadow, wave surges from passing ferries, litter and security are long term concerns. Construction impacts are a short-term concern. However, impacts cannot be determined for noise, wind and shadow within the marina area because they were not even measured nor analyzed in the DEIR. (Martin Fay, Rincon Point - South Beach CAC)

And the harbor in its entirety has been ignored from the process in this DEIR. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

During the scoping I wrote the Planning Department staff and attended many Redevelopment Agency meetings to express the importance of these Harbor issues: Debris, Noise, Access, Parking, Lighting, Security, Wind, Shadow, Ferry traffic. (L. Joseph Boss)

The CAC sent out surveys to the affected neighborhood organizations, but again, ignored the 650 harbor tenants. I requested a survey be designed to gather the information needed to gain an understanding of harbor life. How often do you use your boat, what times do you arrive and depart, how many hours and nights do you spend on your boat in the harbor? This was not done. (L. Joseph Boss)

Despite specific verbal and written comments from our CAC members and Redevelopment Agency staff to the Initial Study done previous to the Draft EIR, this document virtually ignores South Beach Harbor. (Rick Mariano)

Project must undertake analysis of impacts upon the South Beach Marina. (Michael Kriozere, Urban West Associates of San Diego)

Anything that will make the Harbor unpleasant will result in people (including our members [of the South Beach Yacht Club]) leaving the harbor. Experience has shown that once members leave the harbor, they quickly leave the club. The simple fear, uncertainty and doubt over the ballpark's impact is causing members to consider leaving the harbor, and bringing the club's and its programs' viability into question. The lack of information on the impact on the harbor is feeding that uncertainty. (Richard Locke, Jr., South Beach Yacht Club)

There is no mention of either South Beach Park or the adjacent Harbor in this section, even though these are the closest properties to the ballpark. If these important open space uses are not mentioned, it follows that the impacts on them cannot be evaluated. Thus, the DEIR is deficient in its evaluation of the surrounding land use. (San Francisco Tomorrow Waterfront Committee)

Other issues of concern [to the South Beach area] includ[e]... impacts on South Beach Marina are nowhere analyzed...[T]here is no quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel)

The marina which is adjacent to the ballpark has been totally disregarded in this analysis. It is a maritime recreational use and, along with the South Beach Park, provides important recreational opportunities to residents and visitors on a year round basis. This is one of the most desirable and pedestrian friendly areas of the waterfront. The ballpark will make it more difficult to access these spaces because of increased traffic and congestion, particularly on weekends, and use of those facilities will be compromised because of increased shadowing and wind problems. But since this recreational context is not even described, the EIR fails to provide the basic information about these uses. The harm to the most substantial peaceful, green space along the east waterfront and the increased difficulty in using this major marina has been totally ignored. This is a significant impact. (Sue C. Hestor, Advocates for South Beach Harbor)

I asked that the Harbor be examined under the CEQA "Recreation" impact guidelines and was told they would be examined under land use. (L. Joseph Boss)

Harbor: Though it has been brought up at several CAC meetings and at public meetings, the DEIR has ignored the existence of the South Beach Harbor. Accessibility (traffic and parking)...must be studied as to the effect on this existing Maritime use of the immediate area. (Janet Carpinelli)

Response

The Initial Study, p. A.47, states that impacts to South Beach Park and South Beach Harbor with regard to land use, noise and transportation/circulation would be addressed in the EIR. South Beach Park is discussed in the EIR on the following pages: pp. I.12 and III.18 - III.19 with regard to SFRA plans; p. III.29 with regard to land use; p. III.49 with regard to views. Impacts on South Beach Park are discussed in Land Use, p. IV.24; Shadows, pp. I.15 and IV.46 - IV.64; Wind, pp. IV.67 - IV.72 and Figure IV.D.12, p. IV.68; Visual Quality, pp. IV.31 - IV.32; and Noise, p. IV.255.

South Beach Harbor is discussed in the EIR on the following pages: p. III.5 describes the policies contained in the Recreation and Open Space Element for the Northeastern Shoreline that are directly relevant to the South Beach Harbor; beginning on p. III.18 is a discussion of the Rincon Point - South Beach Redevelopment Plan, which includes the harbor; p. III.29 contains a description of the marina operations; Wind, pp. IV.68 - IV.72 and Figure IV.D.12, p. IV.68 discuss wind effects nearby. Five wind test points are located along the Harbor pedestrian walkway. Additional information on the impacts to South Beach Harbor

can be found in Wind, South Beach Harbor; Shadow, Shadow Effects on South Beach Harbor; Land Use, Land Use Impacts on South Beach Park and South Beach Harbor: and Noise, Concert Noise, *In South Beach Harbor* in this document. See Land Use, Land Use Impacts on South of Channel Uses, for additional discussion.

South Beach Harbor is described on pp. III.29 - III.30 of the EIR. As described in the EIR, p. III.29, South Beach Harbor contains about 700 boats, most larger than 22 ft. The harbor includes four access gangways, one at Pier 40, two along the east side of the Sailing Ship Restaurant, and one at the south end of the harbor. Public restrooms are located at the south end of the harbor. Boat owners are discouraged to live aboard their boats, however, limited overnight use on up to 10 percent of the berths is permitted.[4] Adjoining Pier 40 includes about six maritime commercial uses and 50 permit-only parking spaces. During observations on a weekend day, most boats carried crews of four or more. Other single and two-person crews mainly tended to their boats' maintenance.

A large number of vessels returned to the harbor around 2 to 4 p.m. A few boats were taken out during this same time period. The boats exit adjacent to Pier 40 at the north end of South Beach Harbor away from Pier 46B and the proposed project site. Some commentors have objected to the breadth of the ballpark as it would change the direction and flow of the wind near the harbor. Observations of boater behavior indicate that all boats return to the harbor with their sails tied down and on motor power. See Wind, South Beach Harbor, for further discussion.

On a warm summer day, South Beach Park averages about 15 to 20 people lying on the grass and several people on the concrete benches. Pedestrian volumes remain at those levels throughout the day, though the adjacent restaurants experience larger fluctuations.

4. Robert Batha, Staff Biologist BCDC, May 15, 1997.

Ballgames would be scheduled for weekday day and evening hours, and weekend day and evening hours. Weekday and weekend day games generally would not conflict with Harbor use since boat owners generally access the Harbor before noon. Ballgame attendees would arrive after noon for the 1 p.m. games. Thus, boat owners would have an advantage in seeking area parking and avoiding potential traffic congestion. Boat owners leaving the Harbor would encounter increased traffic and pedestrians if leaving between 3 and 4 p.m.

Weekend and weekday night games typically begin at 7:05 p.m.: Harbor use and ballpark use would conflict. Boat owners attempting to park and off-land would find traffic congestion and increased pedestrians in the area. Ballpark parking is located away from the harbor, south of the Channel and most auto traffic would be directed to that area.

The discussion of quality of life and neighborhood impacts on South Beach Park, South Beach Harbor, and the maritime uses south of the Channel has been expanded to describe the less quantifiable impacts caused by identified physical effects and to a provide a broader characterization of project effects than have been analyzed in the EIR.

The following paragraph has been added after the first full paragraph, p. IV.23 of the EIR as follows:

> **Neighborhood Effects**
>
> **As discussed in the preceding two sections, the project vicinity, which includes a large residential community, retail community and active maritime uses, would be specifically affected on game days or during other events at the ballpark. These communities would experience auto and pedestrian congestion immediately before and for a while after games. Transportation access would be limited for those accessing residential parking spaces, place of business parking, and recreational activities located in the area. Effects one anticipates from large crowds, such as noise, crowds, and the potential for increased litter would occur.**
>
> **Ballgames and other events would occur on the weekends and could annoy and inconvenience those trying to visit and use non-ballpark uses in the area, e.g. the marina, residences and businesses. South Beach Harbor and Park activities, such**

as boat races, the quiet enjoyment of the marina and park, and off-loading for boat races, would require advance planning.

Development of the ballpark could have a positive effect on some local businesses as some fans would likely stay in the area and patronize existing businesses. Business owners might enjoy the close proximity of the ballpark and the increased pedestrian traffic in a redeveloping area.

The following has been added at the end of the third paragraph, p. I.11 of the EIR to include a summary of Neighborhood Effects:

Ballgames and other events occurring on weekends could annoy and inconvenience people trying to visit and use non-ballpark facilities in the area, such as the marina, local businesses, and residences. Although some advance planning would be needed to coordinate South Beach Harbor and park activities with the ballgames, it is possible that development of the ballpark could stimulate local businesses through increased pedestrian traffic yielding increased patronage.

The new information provided to expand the discussion of South Beach Park and South Beach Harbor land uses does not affect the conclusions of the EIR. Potential effects from the proposed traffic routing plan are discussed in the EIR. As noted at the time, the traffic routing plan is one potential option: the analysis of its effects were meant to provide additional information to decision-makers, and not to determine what the final routing plan would include. See the additional discussion and text revisions under Neighborhood Effects/Quality of Life responses in this section.

Neighborhood Effects/Quality of Life

Comments

I have been coming down to this neighborhood for ten years now. When I first came down there, there really was very little residential. Most of the projects you just saw have been developed during that period. Now, as the area has matured, you have people making the largest investments they make in their lifetime, which is their home. I think it is very important that both these commissions look at this as how it would impact -- how you would look at this if this was being put in your neighborhood. I think if you look at it that way, it will work for everyone, including the Giants. (Mike Gray)

A broader definition of "project," including neighborhood quality of life concerns, must be evaluated. (Martin Fay, Rincon Point - South Beach CAC)

The quality of life in an urban setting such as San Francisco involves many, many things. It involves retaining, for example, City Hall, rebuilding it following an earthquake, refurbishing the buildings in the city. It also involves entertainment, such as the opera. We know that; we are here. It involves entertainment such as athletics. It involves education. It involves a myriad of things that make this a [world] class city. (Thomas Hesketh)

I am not referring here to Potrero Hill or the Mission District, whose neighborhood activists often claim they are the neighborhoods impacted by the ballpark development. I am referring instead to my neighborhood, the South Beach/South Park/Rincon Hill areas which are experiencing a 1990's urban renewal in the immediate vicinity of the ballpark site. As the frenzied residential development of this area was spurred by re-zoning from industrial to live/work use around 1990, I assume it must be too new to have been reflected in some of the more dated or uninformed studies performed to establish the character of my section of San Francisco. In 1997, this former "ghost town" area is hot, chic, and boasts the most active real estate market in the city. Due to the area's climate, character, convenience to downtown and the Embarcadero, buildings are often 100% sold before they are available for move-in! With all this investment, the early trappings of a neighborhood are slowly but steadily appearing—more grocers, cleaners, merchants, etc. Neighborhood groups here want to keep this growth moving forward. We can accept that the Giants have the political and financial muscle to dump a noisy, sports-bar-laden, traffic-congesting ballpark on our doorstep whether we like it or not, but the first step to making the best of this situation is having an EIR that acknowledges the presence of a neighborhood community and at the very least attempts to address our concerns. This can provide a framework for the local community to work with the City and the Giants to find solutions that meet the needs of all parties. (Aidan Costello, Community Awareness Committee, 355 Bryant Homeowners Association)

The majority of the residential is on the east side of Second Street and south of the Bay Bridge. In that triangular area alone, there is well over half a billion dollars in residential properties there which--the quality of life there needs to be addressed. As stated before, the DEIR did not address the neighborhood quality of life issues for a residential neighborhood which we believe need to be addressed and are mandated as such under Prop. M. Items such as litter control...(Richard Dickerson, South Beach Marina Apartments)

In my reading, the Draft [EIR] failed to take some of the concerns of South of Market Neighborhood into account. It is a unique neighborhood, a mix of companies, non-profits, residents living in apartments, lofts, and houses, and retail business. As a business owner and property owner at the Clocktower, the quality of the neighborhood is important to me. The small cafes and restaurants, the unique clothing designers and their small stores, the artisans and their studios, the green space of South Park and the relaxation value of South Beach Harbor and the Embarcadero all add to the special feeling of the neighborhood. The

thriving industry of internet/new media of which in part is especially important to the activity of my business, (clients, services and suppliers) and to my business image as part of the up-and-coming "South of Market" area. (Elizabeth Carney)

I understand people want a stadium, and, frankly, if there are some negative effects due to the stadium, I am willing to put up with some of them. But it is not fair for ask---to have our neighborhood destroyed or seriously denigrated for the sake of a project like this. (Sarah Ames)

Rick Mariano and others from the South Beach CAC said a real deficiency in the EIR is that non-CEQA neighborhood issues are not discussed whatsoever, issues such as noise from pedestrians, litter, security, graffiti, those sorts of neighborhood quality of life issues which are simply defined out of the EIR because they are not CEQA issues. That may be the case, but I think they need to be an analyzed somewhere. If they are not going to be in the EIR, they need to be analyzed somewhere else. (Steve Vettel, Bay Side Village Associates)

These neighborhood quality-of-life impacts associated with the ballpark and with other recommended mitigation measures must either be analyzed in the Final EIR or, if you determine these issues are outside CEQA, in a separate neighborhood impacts study that is provided to decision makers at the same time as the FEIR. Information from other cities with downtown ballparks can provide a basis for this analysis. (Steven L. Vettel, Gladstone & Vettel)

[N]ot well covered by the DEIR are livability issues related to impacts on small businesses and crowd generated litter and graffiti. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

A plan must be included that protects residents and small businesses from the impact of traffic intrusion and ensures adequate parking, service and loading spaces will be available to small businesses and residents of the area. These neighborhood quality of life standards are mandated by Prop M, priority policies. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Noise, glare, view, shadows, wind and bay water quality would be big, new problems for the area if the project is built. (Joel Ventresca)

The project description itself should have included the maintenance of neighborhood quality of life, and the continued operation of existing neighborhood facilities such as the marina, as "part of the project". Mitigations necessary to accomplish this third goal should be "part of the project", not an afterthought. (Rick Mariano)

The ballpark is for the whole city, not just a neighborhood. (David Herring)

In summary, maintaining neighborhood livability within the greater Rincon Point South Beach area should be included within the definition of the "project" analyzed by the DEIR. This area is generally defined as being bounded by Bryant Street to the North, Third Street to the West, China Basin Channel to the South and the San Francisco Bay to the East. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

[T]here have been comments that this proposed park would affect the local community, comments that the project has not been properly defined. I think that misstates the issue. The community is the community of San Francisco, not simply a local area within the City of San Francisco. As I said, I live in the Richmond District, but San Francisco is 49-square miles. It is not one square mile or two square miles. It is not a few acres. This is a community of 700,000 plus people. I think that the comments that have been directed to the commissioners have not addressed that fact. (Thomas Hesketh)

I feel that the draft EIR sort of sets up that problem is really based on how they define the project that they looked into. They really spent a lot of time working on analyzing the Giants' plans to build and to operate a ballpark facility in the neighborhood. They should have, in my opinion, and in the CAC's opinion, spent time analyzing how the Giants could build and operate the ballpark in this neighborhood while maintaining the quality of life in this neighborhood. Had they taken that approach, they would have identified lots of mitigations in the draft EIR that I think would have eliminated a lot of the muss and fuss we are going to have to go through here in the next while. I'll just cite some of these things. For instance, we had an initial study meeting before the draft EIR was written and submitted written and oral comments to the authors. While many of the things which we pointed out were covered, some were simply not. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

[The specific area plan assumptions that the DEIR must analyze must include]...a plan that defines and mandates the practice of good neighbor policies by ballpark operators to ensure the protection of neighborhood quality, livability and character...(Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

The commentors above generally raise two related points. First, they state that the "Project Description" in the EIR is too narrow, particularly in not explicitly acknowledging the existence of a residential neighborhood in the immediate vicinity of the ballpark. Second, the EIR does not describe the impacts the ballpark project would have on the quality of life in the neighborhood.

The Land Use section text and graphics show and describe, among other things, the existence of residential units, a marina and commercial uses that are the constituent parts of a neighborhood. The presence of the South Park neighborhood is noted in the discussion of North of Townsend Street, p. III.32 of the EIR. See Land Use, Land Use Impacts on South Beach Park and South Beach Harbor, for discussion and additions to the text.

The commentors are correct in noting that the EIR does not specifically address the subject of "Quality of Life" in the neighborhood in precisely those terms. This is a challenging issue for any environmental assessment. The charge under CEQA is to assess the potential physical impacts of a project. The EIR addresses these issues by topic. The EIR attempts, as far as possible, to present a quantitative assessment of impacts. Quality of life is a concept that is important but difficult to quantify. There is no agreed upon standard or measurement and it is inherently an experiential and subjective judgment. For example, background crowd noise may be perceived as adverse or pleasant depending on the individual's perspective and precise distance from the source. Similarly reaction to lighting impacts could vary from indifference to severe annoyance from people in the same locations depending on individual sensitivities. Further, the experience of "Quality of Life" in a given area is a combination of the experience of many factors. For example, one may find the individual noise, traffic or parking shortage impacts of an event tolerable but find the collective impacts to constitute an unacceptable impact on the quality of life in the area, at least during event times. In addition, there is no agreement on the components of Quality of Life for example, one commentor has stated that it includes athletics as an entertainment ingredient. Others may disagree with that position.

The quantified and topic by topic nature of the EIR discussion does not lend itself easily to a description of "Quality of Life." Nonetheless, the information presented in the EIR does make it possible to draw inferences as to the project's effect on quality of life. For example, in describing or illustrating impacts in comparative terms, e.g., light equivalent to or less than street lighting, noise equivalent to a kitchen garbage disposal etc., the EIR attempts to present information that the public and decision-makers can use to make an individual

assessment of the likely overall effect of the project. Nonetheless, no conclusive characterization of quality of life effects can be made due to its subjective and unquantifiable nature.

However, in response to comments on the EIR, the land use discussion has been expanded, to the extent possible, to describe the less quantifiable impacts caused by identified physical effects and to a provide a broader characterization of effects beyond individual topic headings, see Land Use, Neighborhood Effects/Quality of Life. See Initial Study, Community Services, for discussion regarding neighborhood impacts.

In response to the comment that additional study be done on non-CEQA effects, such a report certainly could be developed. It would be in addition to the CEQA documents required by State law, but could be included as part of the public record for the project. The recommendation for a "Plan to Protect Affected Adjacent Neighborhoods" is discussed in Mitigation, Neighborhood Protection Plan.

VISUAL QUALITY AND LIGHTING

Visual Quality

Visual Quality - Views of Project

Comments

Graphically, it appears that this EIR is contrived to minimize comprehension of the true impact of this project:

a. The most comprehensive views are taken from hundreds of feet in the air - views which glamorize the project, but views which few people will see, and no one will have to live with.

b. Views are illustrated that mask or minimize meaningful comparison with the surroundings. Vantage points for important views are taken from angles that encompass the narrowest bulk of the proposed building. (Joel Ventresca)

P. IV.31[There must be a photographic representation, both before and after of the project] from the residential properties in the South Beach area because they will uniquely be impacted by this project. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Section IV.C Visual Quality and Lighting, pp. IV.25 - IV.33, addresses effects of the proposed ballpark on visual quality. The section includes photosimulation graphics of the ballpark from a range of viewpoints, shown in Figures IV.C.1, IV.C.2, and IV.C.3, pp. IV.28, IV.29, and IV.33, respectively. The photosimulation locations include viewpoints expected to have high pedestrian flows near the ballpark, such as The Embarcadero near South Beach Park, or Third Street near Townsend Street. These locations present the ballpark in the context of intervening buildings, as documented in the figures. The long distance viewpoint from Potrero Hill is representative of a location in a hillside residential neighborhood showing the ballpark in a larger urban context.

In addition to the three photosimulations, Figures IV.C.4, p. IV.37; Figure IV.C.5, p. IV.39; IV.C.6, p. IV.40; and Figure IV.C.7, p. IV.42, are computer simulations of the

ballpark structure, including general outlines of surrounding buildings. Those graphics illustrate the scale and massing of the ballpark and show viewpoints for the lighting analysis. For example, Figure IV.C.6, p. IV.40, shows most of the King Street frontage and the 175-foot-high light standards, in contrast to older, smaller buildings on the north side of King Street. The first three figures listed are shown from street level. Figure IV.C.7 illustrates the Second Street-King Street frontage, as seen from an upper floor of the South Beach Marina apartments. This upper-floor perspective is useful for the lighting analysis and is representative of views from some dwelling units.

The difference in height between the ballpark and other structures in the vicinity is discussed on pp. IV.26 - IV.27. Page IV.27, first full paragraph, states:

> "At 130 ft., the ballpark structure would be taller than other buildings in the vicinity, with the exception of the uppermost building elements of the South Beach Marina Apartments complex, estimated to be about 130 to 140 ft. in height."

This height difference is seen in Figure IV.C.1, p. IV.28.

Views from Third Street

Comment

Graphically, it appears that this EIR is contrived to minimize comprehension of the true impact of this project:...The public deserves a driver's view of the proposed project from Third Street looking north at the corner of 4th Street (see Fig. [IV.]E.1, p. IV.80). (Joel Ventresca)

Response

Views from Third Street near Fourth Street, south of the project site would include the 900-ft.-long China Basin Building, the Lefty O'Doul Bridge, and the ballpark structure. From this location, the ballpark would appear similar in horizontal dimension, but taller than the China Basin Building. This visual relationship between the ballpark and the China Basin Building is also illustrated in new Figure IV.C.2.a, added to the EIR, as discussed in Response in Visual Quality, Views from China Basin Area.

Comment

Figure III.C.5 (and related rendering at IV.C.1): Why is this rendering from a traffic lane looking against the traffic flow -- literally no one will see this view except in a rear view mirror? A more helpful perspective would be a pedestrian eye view walking south. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Figure III.C.5, View of Project Site: View Southeast from Third Street at Townsend Street, EIR p. III.50, was photographed about 12 ft. from the west sidewalk of Third Street to eliminate close-range view obstruction from parked cars. This view generally illustrates a pedestrian view approaching the ballpark site from the north. A view from the west sidewalk itself would show less context of the China Basin Building west of Third Street. A view from the east sidewalk would limit views of the ballpark site with additional foreground buildings on Third Street.

Figure IV.C.1, p. IV.27, Photosimulation View Looking Southeast: Third Street at Townsend Street, is a street-level view that encompasses the ballpark Pavilion Building near Third Street, and the seating bowl and light standards seen above existing foreground buildings on Third Street. A portion of the six-story China Basin Building is seen west of the Lefty O'Doul Bridge. A view location farther north on Third Street would not include more of the China Basin Building, as both the ballpark and the China Basin Building would be partially obscured by foreground buildings. These views of the ballpark illustrate the extent to which the site would be visible from existing locations, and many depict the full frontage along King Street and Third Street. Additional graphics are not necessary to address these concerns.

Views from China Basin Area

Comments

Graphically, it appears that this EIR is contrived to minimize comprehension of the true impact of this project:...In most views, the China Basin Building (a familiar and very large

building which will be dwarfed by the proposed project) is minimized or shown with very faint lines. This building is only about 600 feet long compared to the project's 900 feet of length alone. It is also less than half the height of the proposed stadium seen from the ground level. The two buildings taken together extend nearly 2000 feet horizontally with the stadium extending 100 feet above the China Basin Building. No views and no discussion reveal this fact. Few people realize what San Francisco will really be living with into posterity...

...Figure III.C.4[A] and Figure III.C.4B both deserve a comparison photomontage of the proposed project illustrating the "after" view. The orientation of the photo itself should be shifted some to the right, still encompassing the length of the China Basin Building but fully showing the true width of the site and showing the public more realistically the true breadth of the project compared to the surroundings. (Joel Ventresca)

Response

The main King Street facade of the ballpark, separate from the Pavilion Building which is set back, would be about 750 ft. long. The overall distance from Second to Third Street is about 900 ft. The China Basin building is also about 900 ft. long, between Third Street and Fourth Street.

Figure III.C.4A and Figure III.C.4B on p. III.48 show existing views of the project site from the China Basin area, from the Lefty O'Doul Bridge or from the South Beach Harbor fishing pier. A photosimulation from the Lefty O'Doul Bridge, from the location in Figure III.C.4A, would not show the ballpark in context. As discussed below, a photosimulation from a South Beach Harbor viewpoint has been added to the EIR.

Pages IV.30 - IV.31 of the EIR describe views of the ballpark from China Basin; p. IV.31 notes that the "arched window and entry area wall would be about 640 ft. in length extending east from the Third Street frontage to the centerfield restaurant at the southeast section of the ballpark" (the 640 ft. length does not include the Pavilion Building setback or the King Street - Second Street clock tower setback).

To elaborate on existing discussion of views of the ballpark from China Basin, the following has been added as a new, first full paragraph, on p. IV.31:

From locations in China Basin, in South Beach Harbor or from Pier 46B south of the site, views would include the ballpark Port Walk wall and arcade, visible east of the Lefty O'Doul Bridge and the 900-ft.-long, six-story China Basin Building.

Figure IV.C.2a, p. IV. 31a, shows the proposed ballpark as viewed from the easterly end of the breakwater fishing pier at South Beach Harbor. The project would replace views of the existing Pier 46A structures with the 130-ft.-high, ballpark structure the 125-ft.-high scoreboard, and the 975-ft.-high light standards; China Basin would be in the foreground.

Figure IV.C.2a, Photosimulation View Looking West from South Beach Harbor, has been added on p. IV.31a of the EIR. Figure III.C.4, p. III.48 of the EIR, has been revised to include the base photograph used in the new photosimulation.

As discussed in Visual Quality - Views of Project above, the figures in the EIR graphics illustrate a range of locations of views of the ballpark, including views from King Street, The Embarcadero and Second Street areas in the South Beach neighborhood. Figure IV.C.2, Photosimulation View Looking South from the Embarcadero (Herb Caen Way) at Pier 40, and Figure IV.C.4, a simplified scale and massing drawing, illustrate the ballpark frontage adjacent to the southerly end of South Beach Park, and part of the King Street frontage. As noted above, Figure IV.C.2a has been added to the EIR, and illustrates the scale of the ballpark in relationship to South Beach Harbor and South Beach Park.

Comments

There must be a photographic representation, both before and after of the project as it will be seen from persons seated in the park because the project will add a significant wall to the west of the park. Please include 2 "after" versions -- one with just the ballpark, the other with the garage mound and new building in the South Beach park extension. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Fig. IV.C.2, Photosimulations: Additional views from other locations in the South Beach residential neighborhood and from the South Beach harbor/Pier 46A are needed...

...Page IV.31, South Beach Park: Visual representations are needed to assess the impact of the ballpark on South Beach Park. Fig. IV.C.2 is not adequate by itself. (Steven L. Vettel, Residential Properties Group)

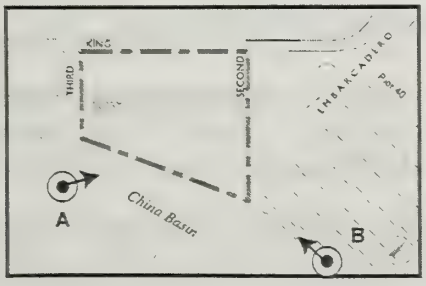
SOURCE: Square One Productions

GIANTS BALLPARK

Figure IV.C.2a (New) Photosimulation View Looking West from South Beach Harbor

Figure III.C.4A: View of Pier 46A East from Lefty O'Doul Bridge

Figure III.C.4B: View Looking West from South Beach Harbor



SOURCE: EIP Associates

GIANTS BALLPARK

Figure III.C.4 (Revised) Views of Project Site
A: View of Pier 46A East from Lefty O'Doul Bridge
B: View West from South Beach Harbor

Response

Figures IV.C.2 and IV.C.4, pp. IV.29 and IV.34, both are views of the ballpark from the northerly end of South Beach Park. Those views illustrate the change in scale with development of the park, with the scoreboard and outfield walls near the park, and the 130-ft.-high seating bowl structure extending west from Second Street. Please see above response in Views from China Basin area, discussing views of the ballpark from South Beach Harbor. Figure IV.C.2a illustrates views of the scoreboard and outfield wall from that area.

The comments concerning views of other proposed structures in South Beach Park appear to refer to earlier, conceptual plans that the Redevelopment Agency had considered for the area that included a maritime-use building fronting the harbor as part of the proposed extension of South Beach Park (see EIR, p. A.5 of the Initial Study). That use was later dropped from SFRA plans for the extension of the park and was not evaluated in the Draft EIR. Therefore, the visual quality analysis does not include such a structure. Figure II.D.3, following p. II.16 of the EIR incorrectly includes the maritime use building. This will be removed from Figure II.D.3 in the Final EIR.

Views from The Embarcadero

Comments

Graphically, it appears that this EIR is contrived to minimize comprehension of the true impact of this project:...Nor is the project shown from farther north along The Embarcadero where it is likely to loom above the residence structures and the marina. The public should see a view from The Embarcadero at Pier 28 and Pier 34 looking south and encompassing the full width of the proposed building with its context. (Joel Ventresca)

Response

Figure IV.C.2, Photosimulation View looking South from The Embarcadero (Herb Caen Way) at Pier 40, p. IV.29 is a view of the project near South Beach Park. That view shows the ballpark structure and light standards, and scoreboard near the park, with the Steamboat Point Apartments in the foreground. A view farther north on The Embarcadero, as

suggested in the comment, near Pier 28 or 34, would show the ballpark at a diminished scale, compared to Figure IV.C.2, with the Pier 40 pierhead building and 130- to 140-ft.-high South Beach Marina Apartments appearing larger in the foreground. Additional graphics are not necessary to address this concern.

Views of Scoreboard

Comments

The *San Francisco Bay Plan's* policies on Appearance, Design, and Scenic Views state, in part, that "All Bayfront development should be designed to enhance the pleasure of the user or viewer of the Bay. Maximum efforts should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas, from the Bay itself, and from the opposite shore...structures near or over the Bay should be designed as landmarks that suggest the location of the waterfront when it is not visible, especially in flat areas." We applaud that the ballpark has been "oriented so the majority of seats in the ballpark would have views of San Francisco Bay (page IV.24 of DEIR)." The fact that "the project design contains elements which seek to open the project to the waterfront, allow views of the waterfront, and integrate pedestrian features with views of the water (Page IV.14 of DEIR)" is also consistent with Commission policies. A couple features of the ballpark require particular sensitivity to assure compliance with these policies:

Centerfield Scoreboard. The 125-foot-high centerfield scoreboard will tower above the adjoining public access promenade and South Beach Park. Generally, the Commission has required that such tall structures be set back farther from the Bay to maintain a sense of openness along the shore and to assure that public access areas along the waterfront are not shaded. The final EIR should explore alternatives that would reduce the height of the scoreboard. Also, the final EIR should discuss whether the scoreboard, which will be 70% advertising, will be visible to people outside the ballpark. Finally, the bayward side of the scoreboard should be sensitively designed so that it is attractive when viewed from the Bay and the opposite shore. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Figure IV.C.7: It is hard to "read" the scoreboard. Show it graphically as such. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

The references to the score board. I look at that damn lottery sign every day, and it blinks, and that is just a part of the character of South Beach (Ben Lubbon)

Page VIII.14, Scoreboard: A reduced or relocated scoreboard alternative should be analyzed to mitigate shadow and light impacts of the current design...

...Page V.1: Additional measures are necessary to mitigate the significant adverse light and glare impacts to South Beach residents associated with evening events at the ballpark:...The scoreboard should be lowered, reduced in size or relocated to prevent obtrusive impacts from the brightly lit and animated scoreboard on surrounding residential units. (Steven L. Vettel, Residential Properties Group)

Alternatives to a single scoreboard (two scoreboards) and a scoreboard of reduced size should be shown and analyzed with respect to visibility from points outside of the ballpark and shadow and wind impacts. (Martin Fay, Rincon Point - South Beach CAC)

Response

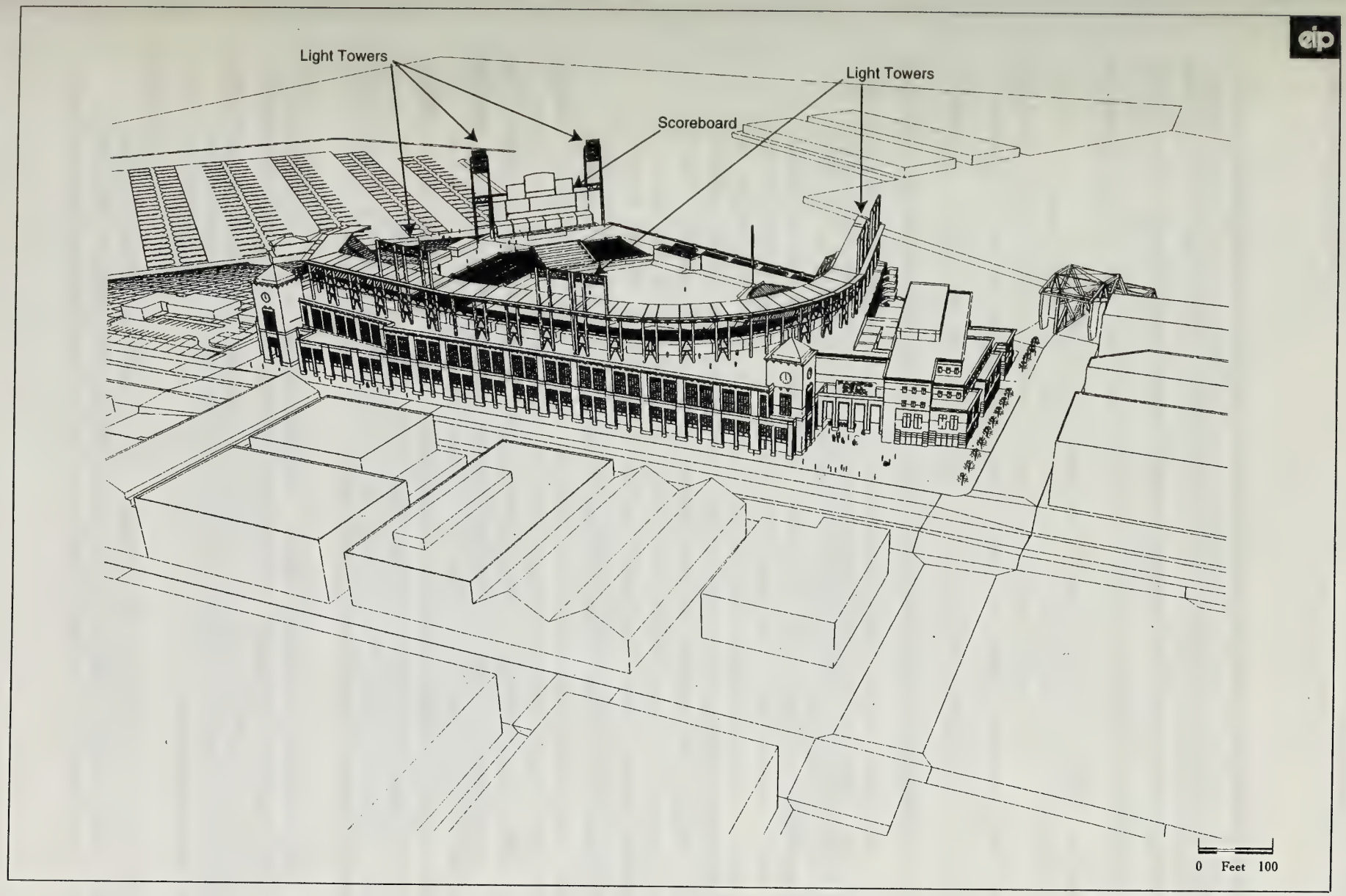
The proposed ballpark scoreboard would be visible from locations near the project site, as illustrated in Figure IV.C.2, p. IV.29, where the centerfield scoreboard would be seen from South Beach Park. Views of the scoreboard from the park are described on p. IV.32, first full paragraph. Figure IV.C.2a, added to the EIR, and shown in Visual Quality and Lighting, Views from China Basin area, also documents views of the ballpark and scoreboard from South Beach Harbor.

Figure IV.C.7, p. IV.42 is a lighting-analysis viewpoint near First Street between Townsend Street and Brannan Street. In Figure IV.C.7, the scoreboard is seen in centerfield, as the vertical surface between the two light standards, on the left side of the graphic.

The ballpark light towers and scoreboard are shown in graphics throughout the EIR. For example, Figures II.D.3 and II.D.4, as the towers extending above the seating bowl; the towers are also seen in Figures II.D.6, II.D.7, IV.C.1, IV.C.2 or IV.C.4.

For information, Figure II.D.1 is repeated below as Figure C&R.1, labeled to indicate the light towers and scoreboard.

Design detail of the scoreboard is currently being refined, but no advertising or special lighting is anticipated for the back side of the scoreboard facing the harbor.



SOURCE: Hellmuth, Obata, & Kassabaum

GIANTS BALLPARK

Figure C&R.1 Aerial View of Proposed Ballpark Looking East

Section A, Introduction to this document, discusses the changes in ballpark design under consideration by the project sponsor: the centerfield restaurant would be eliminated and the scoreboard would be 16 ft. lower, although the same overall size, and would be about 50 ft. closer to centerfield and farther from the South Beach waterfront. These changes would tend to reduce the visibility of the scoreboard from outside the ballpark.

Effects of the scoreboard lighting and video display outside the ballpark are discussed in Visual Quality and Lighting, Lighting Effects - Scoreboard. See also Shadows, Shadow Effects on Scoreboard, for a discussion of scoreboard shadow effects because the scoreboard itself was not found to create significant adverse visual quality, shadow or wind effects, it would not be necessary to consider analysis of a reduced size scoreboard, or a two-scoreboard design.

Views on Second Street

Comments

The [Landmarks Preservation Advisory] Board recommended that the DEIR include an analysis of the potential visual impacts created by the construction of the Ballpark, a massive structure approximately 130 feet in height, across the street from the South End Historic District, which is characterized by warehouse buildings six or fewer stories in height... The Board... recommended that the DEIR include measures to ensure that the structure would be compatible with the design characteristics of the South End Historic District. Board members suggested that the elevations of the Ballpark structure be articulated so as to reduce the scale and bulk of the structure and that the treatment of the exterior make use of materials compatible with the brick buildings in the historic district. (Denise M. LaPointe, President, Landmarks Preservation Advisory Board)

...2. View of Stadium Down Second Street. As many ballpark patrons will walk down Second Street to reach the ballpark, we believe that ballpark tower at the foot of Second Street should be designed as a landmark structure that suggests the proximity of waterfront, consistent with the Bay Plan. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

p. III.44 Views: As described in this paragraph, 2nd St. should be defined as a view corridor. From the top of Rincon Hill looking southwardly that would be the corner of Bryant St. or Brannan St. It is clear that a view of the bay and commercial vessels moored

at Piers 48-50 are visible. This part of San Francisco has been designated "The South End Historic District" and the residents of the neighborhood are very aware of the Maritime presence in this historic area of the city. The loss of this view will have an adverse affect on the character of this Historic district. Please refer to page II.27 Priority Planning Policies. Proposition M (Planning Code Section 101.1). Protection of neighborhood character and protection of public vistas.

p. IV.25 C.Visual Quality and Lighting, This section is totally void of any reference to the 2nd Street views looking south from Rincon Hill. (Jeffrey Leibovitz)

Response

The following text has been added on p. IV.30 of the EIR as a new first paragraph:

> **Drivers and pedestrians approaching the ballpark from the north on Second Street would have views of the ballpark. These views would primarily be of the easterly portion of the King Street facade, with the corner clock tower in the foreground and light standards and scoreboard in the background. Views of the rest of the ballpark from Second Street would be limited because of existing buildings on the west side of Second Street, between King Street and Brannan Street. Existing views south of Second Street can include vessels moored at Pier 50, south and east of the ballpark site. The ballpark would limit some of these views of Pier 50. At Second Street near King, views would include the King Street facade, outfield walls, and scoreboard, with the South Beach Harbor and the Bay to the east.**

As discussed on pp. IV.25 - IV.26, the ballpark design would include the use of red brick and exposed steel beams. The design would include varied massing, arcades and large windows to vary the facade. Those design features are intended to reflect industrial architecture typical of the waterfront context for the ballpark. Pages IV.27 - IV.30 of the EIR discuss the ballpark's King Street facade. Windows would be set into the building face at regular intervals and the windows would each be composed of individual panes with the glazing tinted light green. The ballpark would also have setbacks and the upper levels would not be readily apparent to the pedestrian or motorist from close range. The project sponsor is contemplating eliminating the pedestrian arcade on King Street; see Section A, Introduction.

The Initial Study, Appendix A, on p. A.42 notes that the South End Historical District, including warehouse and other structures related to the maritime past of the area, is adjacent to the ballpark site. The Initial Study concludes on p. A.44 that:

> "No portions of the South End Historical District would be encroached upon by any part of the proposed ballpark."

While the project would change the visual setting near the historic district, the project would not directly affect buildings in the district or the integrity of the district as a whole. As noted above, the project design is intended to include massing and materials reflecting the past industrial context of the vicinity. The Port of San Francisco *Draft Waterfront Land Use Plan* (WLUP) includes "Waterfront Design and Access," criteria for "South Beach Park and Proposed Ballpark" which recommend "design treatments which convey a waterfront identity, as viewed at the terminus of Second Street." The WLUP has not yet been adopted by the Port.

Views of King Street Facade

Comments

Page IV.26, King Street frontage: The Draft EIR fails to state that the project includes a fairly unrelenting 900-foot long arcade along King Street with essentially no openings or functions on non-game days. Describe the potential negative land use impacts of that non-activated, potentially dangerous arcade and its potential to diminish the pedestrian experience. (Steven L. Vettel, Residential Properties Group)

IV.25 - Design Concept: The ballpark will be on the site all year long and will have a visual impact when ball games are not going on. The wall of this facility is much longer than the Planning Code allows on any other site -- it greatly exceeds any horizontal dimension which has been approved in the past decade of which I am aware. While the arcade will "break it up" somewhat, the mass is substantial. How this will "relate" to pedestrians (i.e. comfort level walking by such a long, inactive facility) at non-baseball times should be discussed...

...IV.30 - China Basin: It is difficult to understand the retail along the walk given the scale of the visuals. Please provide some sort of graphic showing the arcade, and retail uses at a scale we can understand. Again, this is an extraordinarily long wall -- way beyond the scale the Planning Code usually permits. What will be the pedestrian comfort level (safe &

interesting surroundings) when the ballpark is not in use? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Views of the King Street facade are discussed on pp. IV.26, IV.27 and IV.30 of the EIR, and note the 900-ft. length of the street frontage, the proposed design, and materials. If constructed, the arcade along King Street would be open to pedestrians during non-game times. The ballpark would replace existing conditions on King Street, which now consists of the partially demolished walls of warehouses between Second and Third Streets. The 900-ft.-long frontage of the ballpark can be compared to the existing China Basin Landing building between Third and Fourth Streets. That 900-ft. block is office use, without retail activities facing King Street.

The scale, materials, and design of the King Street frontage would be intended to relate to pedestrian activities. The frontage would not be expected to create unsafe conditions.

The Port Walk frontage, as described on p. IV.31, would include an arcade, a new walkway providing views of the Bay and into the ballpark, and, if ferry service were implemented, boarding and queuing areas. As with the King Street frontage, the Port Walk would be intended to relate to pedestrian activities, and would not be expected to create unsafe conditions.

The following text has been added at the end of the first partial paragraph, p. IV.27 of the EIR:

> **The ballpark's King Street frontage would be a similar pedestrian environment. The ballpark's King Street frontage would not have retail uses, which would generally be at the Pavilion Building at Third Street, between King Street and China Basin. The King Street frontage would have building lighting and street lighting, and would be adjacent to streetscape elements and the MUNI light-rail median as part of the King Street continuation of The Embarcadero roadway.**

Completeness of Graphics

Comments

Figure III.C.1: The orientation "dot" for lower drawing is in wrong location -- from just looking at photo. Was top photo really taken from middle of roadway?...

...Figure III.C.6 and IV.C.2: Orientation dot appears to be in wrong place. View is from the east side of Embarcadero. Is Sailing Ship restaurant to remain?

Figure III.C.8: The scale of this is such that the waterfront port walk is hard to understand. More helpful would be a relatively short view (e.g. just south of channel) showing a segment of the wall. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page III.40, Figure III.C.1: South Beach Marina Apartments is at Townsend and the Embarcadero, not Brannan and the Embarcadero.

Page III.41: Page III.41 is missing from Draft EIR. (Steven L. Vettel, Residential Properties Group)

Response

Figure III.C.1, p. III.41, shows photographs of the surrounding area, Figure III.C.1A, South Beach Marina Apartments, The Embarcadero and Brannan Street, has a typographical error. The location is at The Embarcadero and Townsend Street, from a location in the median of The Embarcadero. The corrected figure, including the location diagram, is included below.

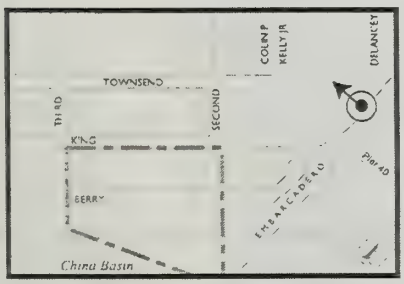
Please note that Figure III.C.1 is on p. III.41. The figure pages do not have printed page numbers; they follow the preceding text page number.

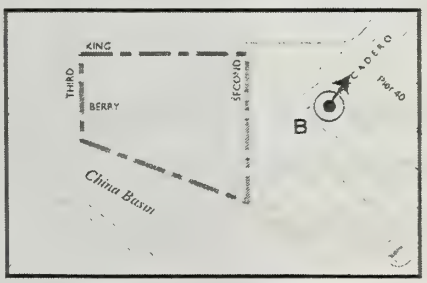
Figure III.C.1.B, South Beach Park and Sculpture, is correctly shown as a view north from South Beach Park, with the Bay Bridge in the background.

Figure III.C.6, p. IV.41, View of Project Site: View Looking South from The Embarcadero (Herb Caen Way) at Pier 40, includes a location map with the center of the arrow on the east side of The Embarcadero, the correct location of the photograph. The Sailing Ship

Figure III.C.1A: South Beach Marina Apartments, The Embarcadero and Townsend Street

Figure III.C.1B: South Beach Park and Sculpture





SOURCE: EIP Associates

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Figure III.C.1 (Revised) Surrounding Areas
A: South Beach Marina Apartments, The Embarcadero and Townsend Street
B: South Beach Park and Sculpture

Restaurant, shown in Figure III.C.6, is currently expected to remain at this location. Figures III.C.6 and IV.C.2 are included below, revised to include the existing awning on the Sailing Ship restaurant.

Figure III.C.8, p. III.54, is an illustration of the proposed ballpark, as seen from above China Basin, to illustrate the Pier 46B area. The proposed Port Walk is shown extending along the China Basin frontage in Figure III.C.8, and is described in Chapter IV, pp. IV.30-IV.31, with dimensions, materials, and relationship to other project elements. Figure III.C.8 in Chapter III, Environmental Setting, is an illustration of the project design, including the Port Walk. For organizational clarity, that figure is moved to Chapter II., Project Description, as new Figure II.D.8, p. II.24a.

The first paragraph on p. II.23 of the EIR has been revised as follows to refer to Figure II.D.8:

> **The waterfront would serve as a key element in the project design (see Figure II.D.6). Nearly all of the ballpark's waterfront frontage would be just beyond the right-field wall (see Figures II.D.7 and II.D.8). The existing waterfront area at Pier 46B, now off-limits to pedestrians, would be improved to provide access to the ballpark and waterfront. Pedestrians on the walkway along the waterfront could see into the ballpark through a series of arched openings that would provide a direct view of the playing field. Proposed improvements to the existing walkway surface include the application of a new patterned concrete surfacing with a salt or exposed aggregate finish.**

The last sentence in the last paragraph, on p. III.53, "Figure III.C.8 shows the Pier 46B area" has been deleted.

See corrected Figure III.C.1, identifying the location of South Beach Marina Apartments at The Embarcadero and Townsend Street. Please note that Figure III.C.1 is on p. III.41. The figure pages do not have printed page numbers; they follow the preceding text page number.

SOURCE: Square One Productions

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Figure III.C.6 (Revised) View of Project Site:
View Looking South from The Embarcadero (Herb Caen Way) at Pier 40

SOURCE: Square One Productions

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Figure IV.C.2 (Revised) Photosimulation View Looking South from Embarcadero (Herb Caen Way) at Pier 40

Visual Quality - Heights of Buildings

Comment

Page IV.27 First sentence of first paragraph essentially repeats last sentence in second paragraph. Strike first sentence. (Rincon Point South Beach CAC)

Response

To avoid redundancy, the last sentence in the second full paragraph, on p. IV.27, has been deleted.

Lighting

Lighting Effects on South Beach Harbor

Comments

Light and glare: The effect of ballpark lighting on boaters attempting to land in difficult circumstances may or may not be significant. Again, we don't know because the issue was not mentioned. (Richard Locke, Jr., South Beach Yacht Club)

A[n]... item that has not been addressed, ...has to do with ...lighting, but it is a different angle on it. Someone has described the difficulty of putting a boat into a slip in a cross wind. Try that at night. It is bad enough during the day. You try that at night when you have about a one-foot clearance of either side of a five ton [tow] boat, and now we'll shine lights in the eyes of the person coming in at the same time. Maybe there is not going to be lights in the eyes, but the issue has not been addressed. (Dick Locke)

In addition to direct traffic and parking impacts, the effects of the...parking lot and stadium lights...should be specifically addressed for the waterfront area, and appropriate mitigation measures that do not inordinately burden existing users must be included and funded in the project plan. (Comment from petition attached to letter by John H. Super, Commodore, Bay View Boat Club, and to letter by Betty A. Boatright)

Impacts which have not been thoroughly enough studied, documented and for which adequate mitigation has not been developed include: ...confining effects of intense human activity, including ...light ...to the stadium site, and preventing these activities from adversely affecting the waterfront and bay fisheries. (Dave Mochel, Penguin Boat Co.)

Page IV.43, Harbor: There needs to be a lighting analysis from a location in South Beach Harbor, since many boaters spend evenings on board. (Steven L. Vettel, Residential Properties Group)

Amazingly to me, no analysis was done on the effects of the ballpark on the harbor in terms of... light pollution,..(Rick Mariano)

[T]he draft EIR virtually ignores the South Beach Harbor. It is, to me, really quite a glaring omission....They did not do light out in the harbor. They did not address that situation. It [is] amazing. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

In addressing some of the issues about light and sound and possibly wind not being studied in the areas immediately adjacent to the ballpark, if there is very little impact of those things, especially light and sound on the ballpark area itself, I hate to say this, but it doesn't take a rocket scientist to think that further away is not going to have any worse impact. (Neil Rabin)

No attention is given to the effect of ballpark or event lighting on the kinds of overnight uses described above, even though it is addressed regarding the impact on neighboring apartment buildings...

More study needs to be made regarding the impact of light standards and the PacBell sign on the tenants in the harbor. (Doug Gooding, CAC member)

The environmental impacts on South Beach Harbor warrant specific attention. Impacts on this most immediate neighbor of the new ballpark have been seriously overlooked. The marina was treated as though it weren't even there. This reflects an inadequate understanding by DEIR authors of the marina's function and role as a recreation and open space resource... The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... light... impacts on harbor use [are not] adequately addressed. (Martin Fay, Rincon Point - South Beach CAC)

You have totally ignored the impact the lighting will have on the adjacent marina. People sail and return to the harbor in the evening. They have to maneuver into a harbor with very little clearance. How will the lights reflect on the water? Will the lights shine into the eyes of those sailing? What effect to those on their boats in the harbor? Also ignored is how the lights will affect the South Beach park. (Sue C. Hestor, Advocates for South Beach Harbor)

...[T]he lighting impacts. This is the backup documentation that you don't even have in your EIR. They don't mention a harbor. They mention a harbor, but they don't -- they say it is there. It doesn't study it at all. (L. Joseph Boss)

Impact on the South Beach marina, including...lights...must be considered and minimized. (Abigail A. Grafton, M.A., M.F.C.C.)

Response

The EIR lighting analysis presented on p. IV.34 - IV.45 is based on M●E Engineers, Summary Report for San Francisco Environmental Lighting, January 1997, cited in Note 2, p. IV.45 of the EIR. The report is available for public review at the Office of Environmental Review, 1660 Mission Street, San Francisco. The computer modeling of spill lighting included areas of east of the ballpark, South Beach Harbor and China Basin. The following has been added as a new first full paragraph, p. IV.36 of the EIR:

> **Figure IV.C.3a presents contour lines for Maximum Vertical Values, in foot-candles, of field-lighting spill effects around the ballpark. Maximum Vertical Value refers to light levels observed looking directly at the source. (The use of the term "maximum vertical," is a convention, and does not necessarily represent a 90 degree vertical view.) The spill lighting analysis also computed estimated Horizontal Values and Vertical Values. Horizontal or Vertical Values represent measurements in 90 degree directions. Those values represent foot-candle levels from light sources not necessarily directly viewed by an observer, and would generally be lower than Maximum Vertical Values. For example, the "5" contour in Figure IV.C.3a represents a distance at which a measurement looking directly at the light source would be 5 foot-candles. The different values would be those recorded by a light meter in, for example, South Beach Park pointed directly at the light standards (Maximum Vertical Value), straight ahead (Horizontal Value), or straight overhead (Vertical Value). Horizontal values would those experienced by an observer looking straight ahead, even if the light source were above the observer.**

New Figure IV.C.3a, herein, added on p. IV.36a of the EIR, illustrates contours around the ballpark site of Maximum Vertical Values, from field lighting, in foot-candles.

See also Visual Quality and Lighting, Field Lighting Effects regarding exterior lighting at the ballpark.

The following text, based on the M-E report, has been added as a new second full paragraph on p. IV.43 of the EIR:

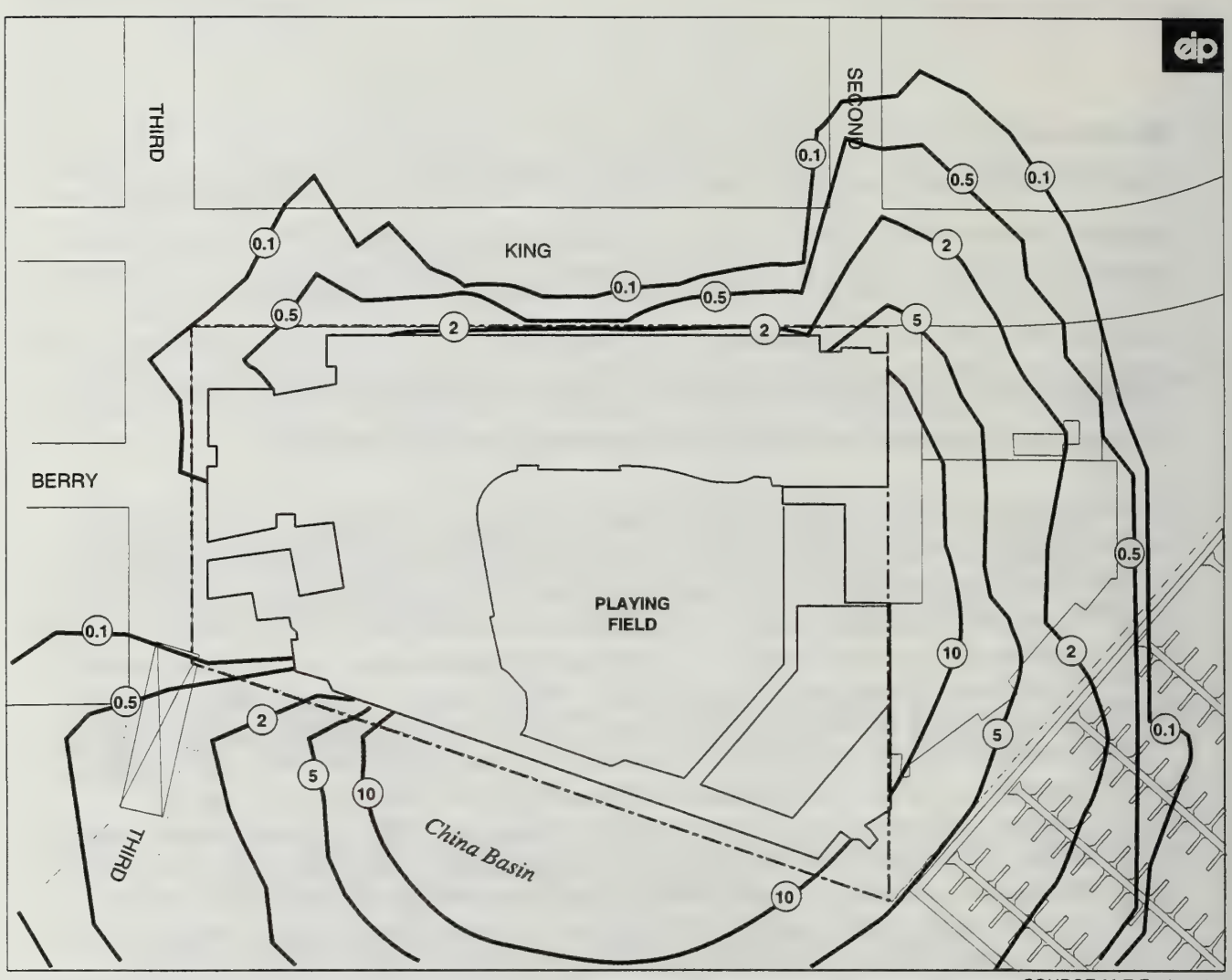

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Figure IV.C.3a (New) Spill Lighting Analysis

South Beach Harbor

From locations in South Beach Harbor, from about 100 ft. to 1,200 ft. from the ballpark, the back of the scoreboard and outfield light banks would be visible; parts of the left-field and right-field banks would be visible, depending upon the location in the harbor. Computer modeling indicates that spill light in South Beach Harbor locations would have a maximum vertical value of 5 foot-candles or less. Five foot-candles would be similar to conditions on a street with bright street lighting and light from structures, such as security lighting or retail displays. Near the harbor entrance, the maximum vertical value would be about 0.25 foot-candles. In some locations in the harbor, the right-field light standards would be visible. Computer modeling indicates that spill light in horizontal and vertical dimensions would be unobtrusive to South Beach Harbor at less than 0.2 foot-candles. In comparison, street lighting and other building lighting would generate about 2.5 foot-candles. The illumination emitting from the lighting fixtures would be seen at their source, but there would be no obtrusive light or glare causing vision impairment. Ballpark lighting would be seen from the harbor with a background by of street lights, surrounding buildings, and harbor lighting during nighttime hours.

In Chapter I, Summary, p. I.14, paragraph one, the first sentence has been revised:

In general, from street-level locations ~~near the ballpark~~ and in South Beach Harbor, the illumination from the light standards would be seen at their source, but there would be no obtrusive light or glare that would impair vision.

Ballpark lighting would not be expected to create obtrusive glare that would affect navigation in or near South Beach Harbor.

Field Lighting Effects

Comments

Page IV.36, Spill light: The analysis of spill light is based on a computer model. If this model proves inaccurate, there needs to be a method to adjust the ballpark lighting the achieve the 1 foot-candle spill light standard set forth. Can the Giants reduce field lighting levels if necessary? Is the 300 foot candles mentioned in the M-E Engineering background lighting report a league requirement, or is it optional?...

...Page V.1: Additional measures are necessary to mitigate the significant adverse light and glare impacts to South Beach residents associated with evening events at the ballpark: ...2.

The EIR should evaluate whether a more [dispersed] sports lighting system (rather than only on two towers in Center Field, for example) would reduce glare impacts to area residents. 3. As lighting technology improves, the sports lighting system lamps should be replaced with state-of-the-art equipment. (Steven L. Vettel, Residential Properties Group)

South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...extraneous lights...that will accompany the new ballpark. (Janet Carpinelli)

[EIR IV.41 indicates that lighting analysis was undertaken no closer than location 4. It is reported that light and glare would be obtrusive at this location. Site L is fully 325 feet closer than location 4 study site yet is totally omitted from analysis. Omission of Site L from this study raises issues of adequacy and completeness of the EIR. (Michael Kriozere, Urban West Associates of San Diego)

I believe the majority of voters on Potrero Hill voted against Proposition B (which approved a privately funded stadium) not because they are against a new stadium or do not like baseball, but because they knew that it would be exceedingly difficult to build such a stadium in China Basin without severely affecting the neighborhoods surrounding this area and the greater San Francisco area as well. A thorough reading of the Draft EIR has proven these fears to be well founded. Not only is Potrero Hill excluded, or mentioned with the intent of exclusion, in many key sections of the Draft EIR, but many of the conclusions drawn in the Draft EIR are clearly illogical and misguided. The most significant of these conclusions concern:...

- ...light pollution. (Sarah Ames)

Graphics in the Draft EIR fail to communicate issues and points under discussion. Generally, graphics are deficient because elements are not labeled or otherwise highlighted. For example, in the discussion on light impacts, light standards and lighting banks are not labeled...

Renderings and graphics should illustrate / define all sources of light...

...The number of housing units, built, approved, and planned and directly impacted by light intrusion must be identified. (Martin Fay, Rincon Point – South Beach CAC)

Lastly, we need to address the lighting concerns. It was stated that in my project, glare from the lights will be annoying to people in their apartments...those were stated as not being any sort of significant impact. To the people living down here and calling it home, it will be a significant impact. (Richard Dickerson, South Beach Marina Apartments)

The Giants will employ the latest lighting technology to reduce light spill and glare and to limit the negative effects of such to the surrounding neighborhood. (Michael Karasik, Bayside Village Associates)

Response

Chapter II, Project Description, p. II.14, and Chapter IV, p. IV.35, describe the lighting system, designed to illuminate specific areas of the field and reduce "spill light" outside of the field. Page IV.34 of the EIR cites 300 foot-candles as an example of baseball-field lighting; however, the field lighting would meet Major League Baseball requirements that lighting for new fields be lit to a 250 foot-candle standard in the infield and to a 200 foot-candle standard in the outfield to ensure adequate lighting for players, fans and television broadcast.

Each of the two outfield light standards would contain approximately ninety 2,000-watt fixtures. The two midfield and two infield light standards placed atop the ballpark canopy would contain about 115 2,000-watt fixtures. The lighting would include internally shielded glare control devices. The ballpark would also include approximately ninety 400-watt high-pressure sodium lamps for interior house lighting, to provide enough lighting for maintenance purposes. It is expected that all lighting except for the internal lights would be turned off when patrons have exited the ballpark, about one hour after the end of a game or other event.

In general, there are three illumination components and landscape contrast that are generated by sports lighting fixtures.[4] The first is the primary beam of the fixture. This beam represents most of the usable light produced by the fixture, and someone standing in this beam would experience uncomfortable glare. All of the fixtures used for the stadium would have this beam area contained within the ballpark. This is controlled, because of the need to provide broadcast quality lighting for the event and also avoid uncomfortable glare for the players. Beam efficiency for the current technology fixtures is 50-60 percent, compared to older technology that was 20-30 percent efficient. (Efficiency refers to the amount of light that is contained within the intended spread of the reflector.) A person looking into the

4. M•E Engineers, Giant Ballpark Environmental—Spill Lighting, memorandum from Ed Ragain to EIP Associates, May 6, 1997. This document is on file and available for public review at the Office of Environmental Review, 1660 Mission Street, San Francisco.

primary beam of the fixture will normally see spots when one looks away. The more efficient the beam, the more nuisance glare is experienced. The second component is the illumination produced by the reflector of the fixture that is outside the primary beam. This illumination produces a secondary beam that is larger than the primary beam; however this beam is less intense than the primary beam.

The third component of the sports fixtures is spill light diffused to the environment. This illumination reflects into the atmosphere above the position of the fixtures. The less efficient the fixture beam, the more environmental lighting is lost to the atmosphere. At 3Com Park, the environmental spill light is notable, due to the older technology of the light fixtures. Approximately 20-40 percent of the sports light is lost as spill light (i.e., create light outside the stadium) at 3Com Park, compared to 5-15 percent with current technology.

Landscape contrast is the view of the ballpark from a distance with the lighting bank against a background. The darker the background, the greater the contrast and the more visible the sports lighting bank would appear. Views of the ballpark with the background illumination of the city would dilute the effect of the field fixtures. Views of the ballpark with a dark background, such as on the Bay, would present greater contrast.

Glare could be created by the primary and portions of the secondary beam of the light fixtures. The proposed lighting system would contain the primary and secondary beam within the ballpark. It is not anticipated that a more-dispersed lighting system or other measures outlined in the comments would be necessary to avoid significant adverse lighting effects, as the systems as designed would achieve that goal.

The EIR concludes that the proposed lighting system would not have significant adverse obtrusive or glare effects at locations near the project site. Effects on residential areas are discussed on IV.41 of the EIR. The analysis notes that nearby residents with direct views of the ballpark could find field lighting to be obtrusive and annoying if not shielded by window blinds or curtains. These would include residents of upper floors of the South Beach Marina

Apartments, as discussed on p. IV.41. In addition, the vacant at the northeast corner of King Street and Second ("Site L" in the Rincon Point - South Beach Development Area) is proposed for up to 165 units, with a height of up to 130 ft. As shown in Figure IV.C.3a herein, the Maximum Vertical Values from ballpark spill at this site would range from about 0.1 to less then 2.0 foot-candles, and would not be considered obtrusive. As with the South Beach Marina, residents in this proposed building could have direct views of the light fixture, and residents at this location could experience annoyance from lighting during nighttime games or other night events. This localized, temporary and intermittent effect could occur during approximately 40 night games per year and an unspecified number of other events. As explained, the EIR did not find environmental lighting to be a significant environmental effect.

The commentors' opinions concerning the significance of project lighting effects are noted. Chapter VI, Other CEQA Concerns, Section A. Significant Environmental Effects That Cannot Be Avoided If The Proposed Project Is Implemented, p. VI.1, states:

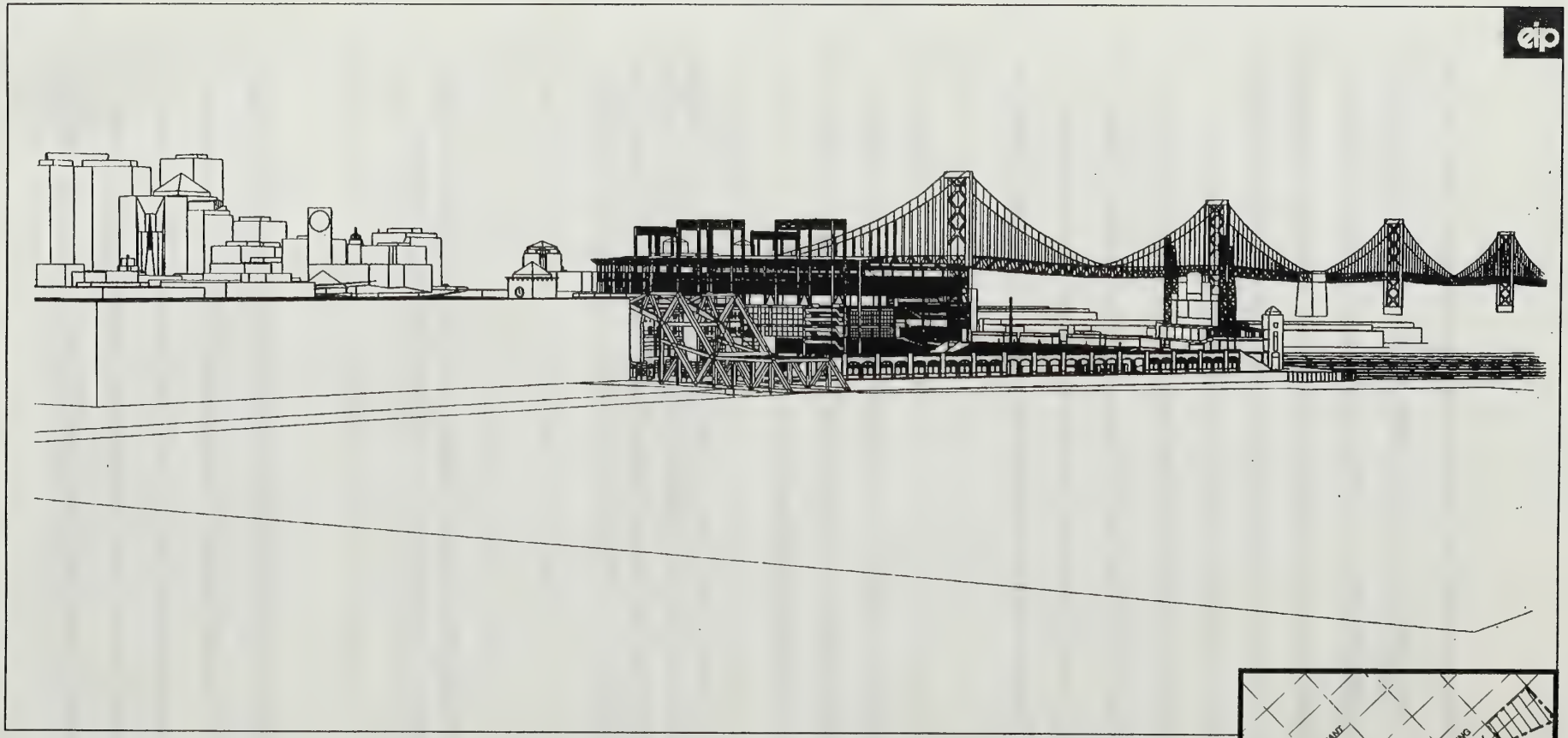
> "The findings of significant impacts are subject to final determination by the Planning Commission and the San Francisco Redevelopment Agency Commission as part of the certification process for the EIR. This chapter in the Final EIR will be revised, if necessary, to reflect the findings of the Planning Commission and the Redevelopment Agency Commission."

Comment

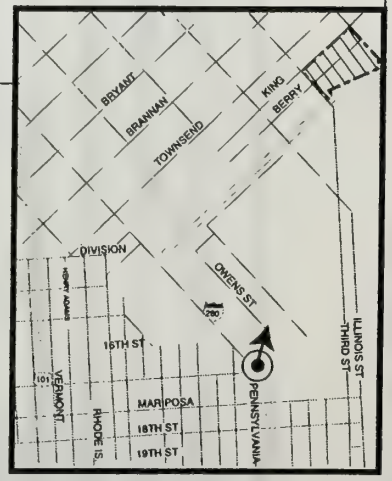
Page IV.44 The view key map for this rendering is incorrect. This view is probably from the intersection of 4th and 3rd Streets. See also Page IV.33 where view key is correct. (Rincon Point South Beach CAC)

Response

Figure IV.C.8, EIR p. IV.44 is a lighting analysis viewpoint graphic from a location about 4,000 ft. southwest of the project site, at the height of the elevated I-280 freeway structure. At this location, there would be an open view of the ballpark, and, as noted on p. IV.41, spill light would be 0.0 foot-candles. This would be a conservative conclusion. At more distant locations in residential areas of Potrero Hill, spill-light values would also be 0.0 foot-



SOURCE: Hellmuth, Obata, & Kassabaum



GIANTS BALLPARK

Figure IV.C.8 (Revised) Location 5; Lighting Analysis Viewpoint Southwest of Project Site

candles. As noted in the comment, the viewpoint in Figure IV.C.8 is not the Vermont Street - 18th Street Location shown in the map key. Pages IV.41 and IV.43 are revised to reflect this corrected location. Figure IV.C.8, with a corrected location key is included below. The discussion of lighting effects at Location 5 on pp. IV.41 and IV.43 has been revised. Edited language is underlined:

Location 5, ~~Potrero Hill~~ Southwest of the Ballpark

Location 5 is ~~on Potrero Hill~~ approximately ~~7,000~~ 4,000 ft. southwest of the ballpark site. From this location at the height of the elevated I-280 freeway structure, the outfield light banks, the left field light banks, the back of the right field light banks, and the scoreboard would be visible (Figure IV.C.8). Views of the left-field banks would be screened by the right-field banks. Computer modeling indicates that horizontal and vertical spill light from the ballpark would be unobtrusive at 0.0 foot-candle by about 500 ft. from the southwest of the ballpark. At more distant locations in residential areas of Potrero Hill, spill light values would also be 0.0.

Background lighting from nearby buildings, buildings across the Bay, and the Bay Bridge would serve to reduce the contrast between the ballpark lighting and nighttime darkness. However, the ballpark lighting would be brighter than downtown building and street lighting. For comparison purposes of glare effects, the full moon on a clear night is perceived as bright, but not glaring (staring at the moon does not cause visual discomfort). If the visual impact of the ballpark lighting as would be seen from ~~from Potrero Hill~~ this location were equal to that of a full bright moon, people could consider the ballpark lighting to be too bright, but not glaring or impairing vision. It would be expected that the visual impact of the proposed ballpark lighting as seen at more distant points from this location, such as on Potrero Hill, would be less than that produced by a full bright moon, or not glaring.

Lighting Effects - Scoreboard

Comments

Though the Giants have promised new style lighting that will eliminate glare on surrounding neighborhoods. I don't believe enough is being done to prove this is possible. I have just heard I am going to be able to read their score board from my back porch due to its size and placement. I understand it will be pointed directly at the Northern slope of Potrero Hill. (Andrea Laudate)

Page IV.41, Location 4: The analysis fails to describe the impacts of the scoreboard and its animated lighting system, particularly at Location 4. The M-E Engineers background lighting report studied only the sports lighting system and contains no analysis of the impacts of the scoreboard, yet the photographs in that report amply demonstrates that the scoreboard at Coors Field in Denver is a major potential glare and spill light source. Lighted animated signs tend to draw the eye more than non-animated lights.

How many dwelling units (existing and proposed) would experience lighting impacts similar to Location 4? How long after the end of ball games would the field lights and scoreboard remain illuminated? The description of these impacts as "localized, temporary and intermittent" significantly under-characterizes this impact, given the number of affected dwelling units and the number of baseball and non-baseball events proposed (the DEIR describes only the 40 proposed ball games and fails to account for non-baseball events). The DEIR states the lighting impacts would be "obtrusive" and "annoying" to residents. This should be considered a significant environmental impact... Would the scoreboard or any of its advertising panels be illuminated at times other than during ballpark events?...

...Page VIII.14, Scoreboard: A reduced or relocated scoreboard alternative should be analyzed to mitigate shadow and light impacts of the current design. (Steven L. Vettel, Residential Properties Group)

The final item I would like to address is with regard to signage. The area already has a huge billboard. As you come across the Bay Bridge, you see it. It flashes at night. It is for the Lotto. You can also imagine sleeping in your apartment or your condominium and having that flash in your bedroom at night. A lot of these units are in the air. We don't care what the score board in the ballpark looks like if it is internally oriented and stays within the ball park. If, on the other hand, it is addressed and flashes at the neighborhood, we see it as a billboard. We think the EIR should specifically look at the score board and what impact it will have on the surrounding residential projects. (Mike Gray)

Is the back of the scoreboard lit? If so, impacts were not analyzed. Animated aspects of the scoreboard were not described nor analyzed. To what degree will scoreboard and advertising be visible from points outside the ballpark? i.e. the Bay, the Bay Bridge, and upper level apartments in South Beach? Will advertising be lit during non-event hours? If so, during what times?... There is no actual description of the scoreboard. An elevation or other scaled and dimensioned graphic should be included showing the various components of the scoreboard, including advertising panels, animated sections and any other unique aspects that would result in fluctuating light emissions visible outside the ballpark. (Martin Fay, Rincon Point – South Beach CAC)

Response

Chapter II, pp. II.13 - II.14, of the EIR describes the proposed 60-ft.-high by 160-ft.-wide centerfield scoreboard, with a video and matrix board for message display. According to the

project sponsor, it is expected that the scoreboard would be lit only during ball games and other events. The scoreboard would be primarily visible only to visitors within the ballpark. Images on the video replay and matrix message display of the scoreboard would not be visible at viewing angles less than 30 degrees and would therefore not be visible from either the South Beach Marina Apartments or the proposed residential development at King Street and Second Street. (The general lighting condition of the scoreboard would be visible.) The ballpark side of the scoreboard would not be visible from the Bay or Bay Bridge. The project sponsor has no plans to illuminate the back side of the scoreboard facing the Bay or South Beach Park.

A limited side view of some advertising panels may be visible from the upper levels of the western towers of the South Beach Marina Apartments and the upper levels of the proposed residential building at Second and King Streets. Any views of the scoreboard from the South Beach Marina Apartments would, however, likely to be obstructed by the proposed residential building at King Street and Second Street. The scoreboard lighting, videos and message display would not be expected to create obtrusive light effects for residents of Potrero Hill, a mile or more from the ballpark.

It can be noted that Coors Field in Denver, Colorado includes a scoreboard similar to that proposed at the Giants Ballpark. There is no record of complaints concerning scoreboard lighting from nearby businesses or residents in high-rise buildings as close as two blocks to Coors Field.[5]

As discussed in Section A, Introduction, the project sponsor is considering design changes that would eliminate the centerfield restaurant, reduce the height of the scoreboard 16 ft., and move the scoreboard about 50 ft. closer to centerfield. Those changes, if implemented, would reduce the visibility of scoreboard lighting from outside the ballpark.

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5. M•E Engineers, Giant Ballpark Environmental—Spill Lighting, memorandum from Ed Ragain to EIP Associates, May 6, 1997. This document is on file and available for public review at the Office of Environmental Review, 1660 Mission Street, San Francisco.

Lighting Effects - Exterior Signage

Comments

Page II.14: Describe the exterior sign plan and the illumination characteristics of the proposed signs...

...Fig. IV.C.4, IV.C.5 and IV.C.7, Location 1, 2 and 4: The figures fails to show the Pacific Bell Park sign facing South Beach Park, a major lighting concern in the neighborhood. The text also fails to describe the illumination and analyze the lighting impacts of this large proposed sign...

...Page IV.45, Exterior Lighting: There needs to be an analysis of exterior ballpark lighting impacts, including illuminated signs. The DEIR contains none...

...Page V.1: Additional measures are necessary to mitigate the significant adverse light and glare impacts to South Beach residents associated with evening events at the ballpark:...The lighting of the Pacific Bell Park sign facing South Beach Park must be indirect or otherwise low impact to avoid light and glare impacts on the park and surrounding residential units. (Steven L. Vettel, Residential Properties Group)

II.13 - Lighting-Scoreboard: Include description of all lit signage, e.g. the Pac Bell sign and when it will be lit....

...Figure IV.C.4: What happened to the Pac Bell sign?

Figure IV.C.5: Is there no signage on these facades?...

...IV.26 - Street Frontages: There is no discussion here of lit signage along the facade...

...IV.31 - South Beach Park: Would the Pac Bell sign be permanently lit 24 hours a day. What type of lighting, how far visible, glare? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

p. IV.31 South Beach Park is the only reference given to any sign. Please describe the sign located at Third St. and the Lefty O'Doul bridge entrance. Also describe the hours of illumination and level of illumination...

...Figures IV.C.4, IV.C.5, IV.C.7 are void of the Pacific Bell Park sign. (Jeffrey Leibovitz)

The Giants have proposed a huge, permanently and brightly lit sign facing the Harbor. This will be an eyesore and a great imposition to anyone trying to enjoy the peace and tranquility now a part of Harbor life. (Janet Carpinelli)

The proposed ballpark will be constructed adjacent to South Beach Marina, an existing, water-oriented recreational facility authorized in BCDC Permit No. 2-84. A number of the occupants of that marina have contacted the Commission staff raising concerns about potential ballpark impacts on the marina. These concerns have included: ... (4) obtrusive light levels from both the "Pacific Bell Ballpark" sign and from the lights illuminating the playing field. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Light Intrusion analysis as a consequence of the recently proposed ten foot tall signage on the South Beach Park exposure is omitted. It must be noted that this signage was not included in any presentation of the ballpark concept prior to the ballot initiative vote. The relationship of Pacific Bell to the ballpark was a "known" yet not reported as conditioned upon placement of this very intrusive sign. Lighting analysis elevation figure IV C 4 does not include the signage yet earlier viewed sections of the EIR (example: IID.3) feature the sign. Omission of the signage in the relevant section of the EIR (lighting analysis) raises questions of accuracy. From a uniquely Site L perspective it seems a demonstration of a lack of sensitivity to neighborhood livability that the largest signage on the entire proposed project would be directed at the residential neighborhood, public park and South Beach Marina. (Michael Kriozere, Urban West Associates of San Diego)

[T]here is virtually no analysis of the exterior lighting of the facility. For instance, there is no analysis of the 10-12 foot high, 125 foot long, illuminated Pacific Bell Park sign, which has the very real potential of being a significant light pollution source for several of the area's residential buildings. (Rick Mariano)

[Signage]... I would also like you to refer to pages, Section IV, Page 31, Section IV, Page 32, Section IV, Figure C-2. Section IV, Figure C-4, Section IV, Figure C-7, Section II, Figure D-3, Section II, Figure D-4. These are all basically the illustrations of the park in the EIR. The reason I'm bringing these to your attention is so far today there has been absolutely no mention about the ten foot by 200 foot Pacific Bell park sign that will be located, I believe, on the northwesterly -- northeasterly corner of this building. The impacts of that sign, I'm sure, will be felt by South Beach Marina, Bay Side Village Apartments, and will clearly be seen from the Bay Bridge. This is paid advertisement on the waterfront within 100 feet of the water. Also, the billboard or score board has the same effect. I think these things both need to be looked at very carefully. At this time, if you look at this document, this document sort of brushes over it. There are three signs, not just one. There is one also at Third Street on the north corner, and there is one at Third Street on the south corner. Those have totally been obscured in this draft EIR. (Jeffrey Leibovitz)

The "Pacific Bell" sign is extremely difficult to find and see in the design illustrations because of the reduced graphics, and in some cases the sign is missing altogether from proposed locations. Using a second color would be one way of emphasizing lighting sources or other specific aspects under discussion or illustrated by a graphic...

...There is no description or analysis of lighting impacts from the Pacific Bell signs. The signs are missing from some graphics and are very hard to find. How often and what hours will they be lit? How intense will light be? What color is the light? What is the impact of a color other than white light? (Martin Fay, Rincon Point - South Beach CAC)

Response

The project would include a sign, "Pacific Bell Park," on the east, or Second Street, side of the ballpark facing South Beach Park and South Beach Harbor. A preliminary design for the sign would be about 130 ft. long, with 11 ft.-high letters, as shown in Figure II.D.3, East/Marina Elevation, p. II.17. (Figures IV.C.4 and IV.C.5, p. IV.37 and IV.39 of the EIR, illustrate field-lighting analysis viewpoints, and do not include all potential exterior signage.) The sign would be proposed to be illuminated 24 hours a day. The final design for the sign would incorporate a diffused neon lighting system, with hoods or screens to avoid obtrusive glare effects for residences, pedestrians, or South Beach Harbor users. Neon light can be seen from a distance. However with the proposed gray pre-cast concrete background, the contrast would be diluted. Neon would not emit obtrusive illumination to the surrounding area. Sign illumination would be less than 2.5 to 3.0 foot-candles typical of street lighting. The sign would be similar to existing building signs in San Francisco, such as on the Ferry Building, the Sheraton Palace Hotel, and the Hotel Huntington. Review of project signage, including the Pacific Bell Park sign, would be within the review process for the conditional use.

Other exterior ballpark lighting and ballpark signage, in addition to the main Pacific Bell Park sign described above, would be planned to have similar lighting levels as typical street lighting or typical commercial signs, and would not be expected to have obtrusive effects.

Lighting Effects - Parking Areas

Comments

Impacts from operation of parking lots south of the channel are not adequately covered. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

The DEIR does not adequately address the [e]ffect that the concerts and ball games will have on Potrero Hill in terms of noise, air and light pollution. ...Lighting, especially parking lot lighting need to be addressed further as well. Will special "theater" lighting be used to light the parking lots and will the glare of the Pacific Bell sign be mitigated? (Sarah Ames)

Any dedicated parking site should be studied and improved (at project owner or parking lot operator expense) for...impact of lights on surrounding neighborhoods (mentioned but not studied in the DEIR for the Mission Bay parking site - see IV.45)... (Corinne W. Woods, Secretary, Bay View Boat Club)

The DEIR does not address visual quality and lighting impacts to or from Mission Bay north or Mission Bay south. (Corrine Woods, Bay View Boat Club, Mission Bay Citizens Advisory Committee)

The parking lot at Mission Bay is a 5,000-car parking lot planned at Mission Bay. No one has addressed the lights at the parking lot. Only the lights in the EIR were addressed at the ballpark. These lights when facing the north slope of Potrero Hill will blind us. (Sandra Peterson)

Lighting impacts from the South of the Channel parking lots were not adequately analyzed. This must be done. Lighting for parking areas shall be designed and placed so as not to constitute a light nuisance when viewed from higher elevations such as Potrero Hill and other residential locations. (Martin Fay, Rincon Point – South Beach CAC)

[Parking Lighting]... Second, with the parking lot lights, I simply do not trust that this will automatically occur, that the mitigation will be to design lights that don't produce glare. I would like to see a requirement in there that before the permit is issued there be some determination made if there is, indeed, a glare from the area surrounding. (John Anderson)

The only mitigation offered in the EIR for the parking lot lights is that the lighting for the parking lot should be designed to minimize spill lighting or glare to surrounding areas (EIR p. IV.45, para. 2). This is fine as far as it goes. The problem is in the execution. The proposed lots will be leased by the land owners (probably Catellus) to developers/operators who will construct the lots. Unless required otherwise, the developer/operator will likely not pay any attention to glare or spill. We who live on the north slope of Potrero Hill know what can and will probably happen. If there is glare and we complain to the developer, he or she will say that the issue of lighting was covered in the EIR on the ballpark and that he or she has a permit and, therefore, no changes are required. Having worked three years to get the developer of the driving range (near the proposed parking lots) to turn the lights away from Potrero Hill, we do not trust that mitigation will occur, if left to the developer. Therefore, I request that the mitigation monitoring program adopted by the Planning Commission for this EIR/project include the following: ....Parking Lot Lights: a. The department shall require the developer/operator of the parking lots to submit the permit application for the lots to the Department for review by the Department prior to the final

processing of the permit to determine if the proposed lighting will provide the maximum mitigation for glare and spill. Further, the Department shall act as agent to resolve any problems of glare or spill that may be identified by persons presenting a petition from 20 or more households and/or businesses within a radius of 6500 ft. of the stadium/parking lot. (John Anderson)

Response

On p. IV. 45, the EIR describes potential lighting effects at parking areas south of China Basin Channel, and notes that:

> "Because the parking lighting has not yet been designed, it is possible that light levels from the parking areas could be seen as glaring from residential areas on the north and east slopes of Potrero Hill. The project would include a mitigation measure to provide adequate lighting in the parking areas for patron visibility and safety, and to minimize spill lighting or glare in off-site areas."

Mitigation Measures, Chapter V, Section A, Visual Quality and Lighting, p V.1 identifies the following measure. The measure has been revised to require achieving spill light levels of 0.25 foot-candles or less, at 5 ft. from the property line of the parking areas. As noted on p. IV.35 of the EIR, 0.1 foot-candle is representative of bright moonlight, and 2.5 foot-candles is typical of major street lighting. The 0.25 foot-candle standard would avoid significant adverse glare effects from parking area lighting. Page V.1, last paragraph, has been revised as follows:

> **The parking area lighting should be designed to minimize off-site glare. The design could include 45-degree cutoff angles on light fixtures to focus light within the site, and specifications that spill lighting from parking areas would be ~~0.1~~ <u>0.25</u> foot-candle or less at 5 ft. from the property line of the parking areas.**

If implemented, that measure would be subject to the required Mitigation Monitoring and Reporting Program for the project, to ensure that significant adverse glare effects on Potrero Hill and other nearby areas from parking-area lighting would be avoided.

The comments are consistent with the conclusions reached in the EIR that parking-area lighting could create adverse glare effects, unless properly mitigated.

Lighting - Time of Operation

Comments

Lighting effects from ballpark can be mitigated by, among other strategies, limiting the number of night games and non-baseball evening events and requiring the sports lights to be turned off immediately after games conclude...

...Page V.1: Additional measures are necessary to mitigate the significant adverse light and glare impacts to South Beach residents associated with evening events at the ballpark: 1. Sports lights must be turned off immediately after night games end. (Steven L.Vettel, Residential Properties Group)

How long before and after events will lights stay on? There should be an agreed-to turn off time for field lights. I.e. 11 PM, 11:30 PM, 12 AM – no [later]. The DEIR must provide this information. (Martin Fay, Rincon Point – South Beach CAC)

Light Intrusion mitigation is simply non-existent. A proposed mitigation as basic as indication of what hour lighting would be turned out is not included. (Michael Kriozere, Urban West Associates of San Diego)

Field lights must be turned off within 1/2 hour of game conclusion. "Pacific Bell Park" east facing signs can not be allowed on after 10:00 PM. The issue of flooding the South Beach Harbor boat tenants with extreme amounts of light at night diminishes the peaceful quality of the harbor as a place for boaters to enjoy. (Mark Miner)

Response

According to the project sponsor, field lights would remain lit for maintenance purposes for about 1 hour after the end of a ball game. For the 40 night games beginning at 7:35 p.m., end times would typically occur at 10 p.m. to 11 p.m., excluding extra inning games. Field lights would thus generally be turned off between 11 p.m. and midnight.

Lighting - Headlights

Comment

Environmental Quality - While project specific impacts are analyzed, issues of light pollution from headlights... are not adequately dealt with, with respect to mitigation. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Response

Project related and other traffic on major roadways near the ballpark, such as The Embarcadero, King Street, and Third Street, would include evening and night-time conditions with headlights on. Vehicle lights would be part of the existing urban lighting environment in the project vicinity. Headlight beams are considered obtrusive generally only when pedestrians would face directly into the headlight beam. This could occur on sidewalks or crosswalks near the site, or for pedestrians in South Beach Park immediately adjacent to the Embarcadero. These intermittent effects would not considered significant impacts.

Lighting - Field Lighting Testing

Comments

I have two suggestions. One is that in the required monitoring program that there be a provision that before the ballpark officially opens, the lights be turned on well in advance of the first game so that there can be some assessment of the impact. (John Anderson)

Therefore, I request that the mitigation monitoring program adopted by the Planning Commission for this EIR/project include the following: Ballpark Lights: a. Prior to the official opening of the ballpark, all stadium lights, including scoreboards, shall be turned on both day and night for at least three days. Representatives of the Department (appropriate agency) shall view the lights from several locations including Potrero Hill and shall provide opportunity for interested parties to meet and discuss the perceived adverse impacts, if any, and possible mitigation measures. There shall be ample time for agreed mitigation measures to be carried out before the official opening of the stadium; and b. No additional lights, lighted signs, reflectors or other apparatus shall be attached to the towers supporting the stadium lights and score board without the approval of the Department. The Department shall provide notice to community groups and organizations on Potrero Hill, South Beach, and other residential areas of any proposed additions or modifications and provide adequate time to review and comment. (John Anderson)

Response

It would be expected that field lighting would be complete about two months before the formal opening of the ballpark. During this period, lighting would be tested for coverage and illumination conditions within the ballpark. This testing period would allow observation of light spill conditions around the ballpark. The following improvement measure has been added as a new second full paragraph on p. IV.43 of the EIR:

IMPROVEMENT MEASURE

The following improvement measure has been identified to address impacts of the project that would be less than significant.

Prior to opening the ballpark, the project sponsor would test the installed field-lighting system to ensure that lighting met operating requirements in the ballpark, and minimized obtrusive spill lighting in the ballpark vicinity. Testing would include light-meter measurements at selected locations in the ballpark vicinity, to measure spill lighting from ballpark field-lighting fixtures, permit adjustment of lighting fixtures, and confirm that spill-lighting effects would be within the range of Maximum Vertical Values for foot-candles in Figure IV.C.3a of the EIR.

Lighting - Other Mitigation

Page V.1: Additional measures are necessary to mitigate the significant adverse light and glare impacts to South Beach residents associated with evening events at the ballpark:...The Giants or City should make a financial arrangement with the owner of the brightly-lit "Lotto" billboard atop 274 Brannan Street to eliminate its intense illumination as an "offset" for the new light and glare associated with the ballpark. (Steven L. Vettel, Residential Properties Group)

Response

The illuminated billboard on the roof of the 274 Brannan Street building, facing west bound traffic on the Bay Bridge, is also visible from residential buildings in the South Beach area. As no significant unavoidable adverse lighting effects of the ballpark are identified in the EIR, a smaller split scoreboard or potential removal of that existing billboard would not be necessary as mitigation for lighting effects. In addition, the 274 Brannan billboard is on private property, and implementation of such measure is not within the control of the Project Sponsor or the City.

Lighting Effects - Cumulative

Comment

[O]n lighting. The EIR on page -- in Section 434 talks about the impact of the lighting from the stadium. And it says, "It would be expected that the visual impact of the proposed

ballpark lighting as seen from Potrero Hill would be less than that produced by a full bright moon." In terms of lumens, perhaps that might be true. But in EIR terms, I think the more applicable term would be obtrusive light and glare. Moonlight is beautiful, but it comes and goes. And the ballpark lights tend to stay on...

...The EIR, p. I.14, para[graph] 1, states that..."It would be expected that the visual impact of the proposed ballpark lighting as seen from Potrero Hill would be less than that produced by a full bright moon." In terms of lumens, perhaps, but in the terms used in the EIR for describing light impact measurements, the impact would definitely fall into the category of "Obtrusive Light" or "Glare" (See definitions p. IV.34). Moon light is beautiful; besides, it changes positions and goes away and comes only occasionally. The ballpark lights will be "on" most of the time at night, unless there are restrictions, if not for an event, for maintenance and other activities. It happens at Candlestick Park all the time. (John Anderson)

Response

On p. IV.43, the EIR describes ballpark lighting effect as seen from Potrero Hill:

> "Background lighting from nearby buildings, buildings across the Bay, and the Bay Bridge would serve to reduce the contrast between the ballpark lighting and nighttime darkness. However, the ballpark lighting would be brighter than downtown building and street lighting. For comparison purposes of glare effects, the full moon on a clear night is perceived as bright, but not glaring (staring at the moon does not cause visual discomfort). If the visual impact of the ballpark lighting as would be seen from Potrero Hill were equal to that of a full bright moon, people could consider the ballpark lighting to be too bright, but not glaring or impairing vision. It would be expected that the visual impact of the proposed ballpark lighting as seen from the Potrero Hill would be less than that produced by a full bright moon, or not glaring."

The comparison of ballpark lighting to a full bright moon illustrates differences of lighting levels seen in a nighttime environment. It was not intended to be a subjective evaluation of a viewer's perception of the light as an esthetic experience. The comment notes the transient nature of moonlight. Ballpark lighting would occur on 40 night games per year and for as many other nighttime events as may occur at the ballpark, and, according to the project sponsor, would be shut off after fans leave the ballpark, about one hour after the end of the game or event. See also Visual Quality and Lighting, Lighting - Time of Operation.

Comments

It will not be just the ballpark lights, however, that cause "glare" and "spill." The proposed parking lots south of China Basin Channel will contain glaring lights unless measures are taken to prevent it. This is recognized in the EIR (p. I.14, para. 2). (Incidentally, I believe that the cumulative impact of the stadium lights and the parking lots have not [been] taken adequately into account in assessing the impacts.) (John Anderson)

In that regard, I would like to point out that I do not think the EIR adequately addressed the cumulative effects of the lights of the stadium and the parking lots that will be in the foregrounds. When those two things are added together, from my point of view at least, it is going to be quite an impact. (John Anderson)

Response

Pages IV.39 - IV.45, and Lighting Effects, Cumulative, first response above, discuss ballpark lighting and parking-area lighting. Because of spill lighting from the ballpark is limited in area and mitigation is identified for parking area lighting, no cumulative adverse lighting effects would be expected to occur, if the mitigation measure were accepted and implemented.

Lighting Effects - Bay Bridge Drivers

Comment

This observation did not occur to me until recently when I was driving over the SF-Oakland Bay Bridge one evening while a Giants game was being played at 3Com Park. As I began to drive up the incline of the eastern section of the Bay Bridge (in the left or second to left lane), the glow from the lighting at 3Com Park was a noticeable distraction to the view of the waterfront. As I continued across the western span of the bridge (still in the left side of the bridge), the glow from 3Com Park was even more significant. This observation was made from a probable distance of at least 5 miles (as the crow flies?) and on an evening where the fog was minimal to nil. If it had been a foggy night, the glow would have been substantially greater. Despite the improvements of current lighting technology in reducing Spill light, it is hard to see how an elevated view from the left side of the Bay Bridge approach to San Francisco would not be negatively affected by the lighting of the extremely close proximity ballpark and how this might not qualify as Obtrusive light (as defined on page IV.34 of the Draft) and therefore constitute a traffic hazard to San Francisco bound traffic on the Bay Bridge. Given the volume of traffic on the Bay Bridge and this potential hazard to this elevated traffic, your final EIR would seem incomplete without a thorough discussion of the probability of this effect. (John Gott)

Response

The light effects described on pp. IV.34 - IV.44 for the proposed ballpark are based upon use of current lighting technology, which would have substantially less spill light effects than does existing lighting at 3Com Park. Because of the limited spill light effects and the distance from the ballpark to the Bay Bridge, about 3,000 ft. or more, no adverse glare would be expected to affect Bay Bridge drivers. In addition, it can be noted that the existing 4-ft.-high solid railing on the Bay Bridge blocks direct views of the ballpark for automobile drivers. Truck, bus or van drivers would have more direct views of the ballpark, but would also not experience adverse glare.

SHADOWS

Shadow Effects on South Beach Harbor

Comments

The EIR does not sufficiently address the impact on South Beach Harbor. Symptomatic of that neglect is chart IV.D.11, which truncates shadows at the water's edge. Because of the nearly-complete lack of study of the stadium's impact on the Harbor, tenants are now reduced to speculating on what the impact will be. If the EIR is passed in its current state, I believe we will be limited in legal recourse in the future. (Richard Locke, Jr., South Beach Yacht Club)

Each one of the Eight Priority Policies has direct relevance to the Ballpark project, and must be addressed by the Giants, the city, or both. Actions or project components which we feel would contribute to a "Priority Policy Conforming Project" that is responsive to each of the Eight Priority Policies include:...

- "That our parks and open space and their access to sunlight and vistas be protected from development."

The primary park and open space impacted by the new ballpark is South Beach Park and South Beach Harbor. Both are vital open space resources that serve immediate neighbors and many San Franciscans. It is important to view South Beach Harbor as usable open space because many people spend the day just sitting on their boat, similar to folks sitting on a blanket at the beach or on a lawn. The open space quality, attractiveness and utility of this land/water resource must be acknowledged and protected as part of a "Priority Policy Conforming" project. Potential adverse impacts on the utility and attractiveness of these open space resources must be mitigated. The DEIR must analyze the impacts on South Beach Harbor. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Though it has been brought up at several CAC meetings and at public meetings, the DEIR has ignored the existence of the South Beach Harbor...shading...problems must be studied as to the effect on this existing Maritime use of the immediate area. (Janet Carpinelli)

As to shadow, the effect of the [ballpark] structure on the harbor is completely ignored. (Doug Gooding, CAC member)

I think the most telling thing in terms of the lack of comment on the impact on the harbor is this chart, Figure 4D-11, which is in the chart, but it mysteriously shows all shadows stopping at the water's edge. The shadows are not the huge issue, but I think the whole EIR

stopped at the water's edge there. (Dick Locke)

In addition, we believe the information in the DEIR is inadequate for BCDC standards. For instance, shadow analysis should show shadow over water and water areas to be covered... (Martin Fay, Rincon Point – South Beach CAC)

...The shadow impacts on the harbor, you have seen it. It stops at the promenade. The shadow continues into the harbor. I think BCDC would probably like to see a shadow harbor -- shadow study. (L. Joseph Boss)

Figure IV.D.1: This and all shadow drawings: improperly stop the analysis at the waterline and neglect the occupied harbor -- boats are there and people use them. (Sue C. Hestor, Advocates for South Beach Harbor)

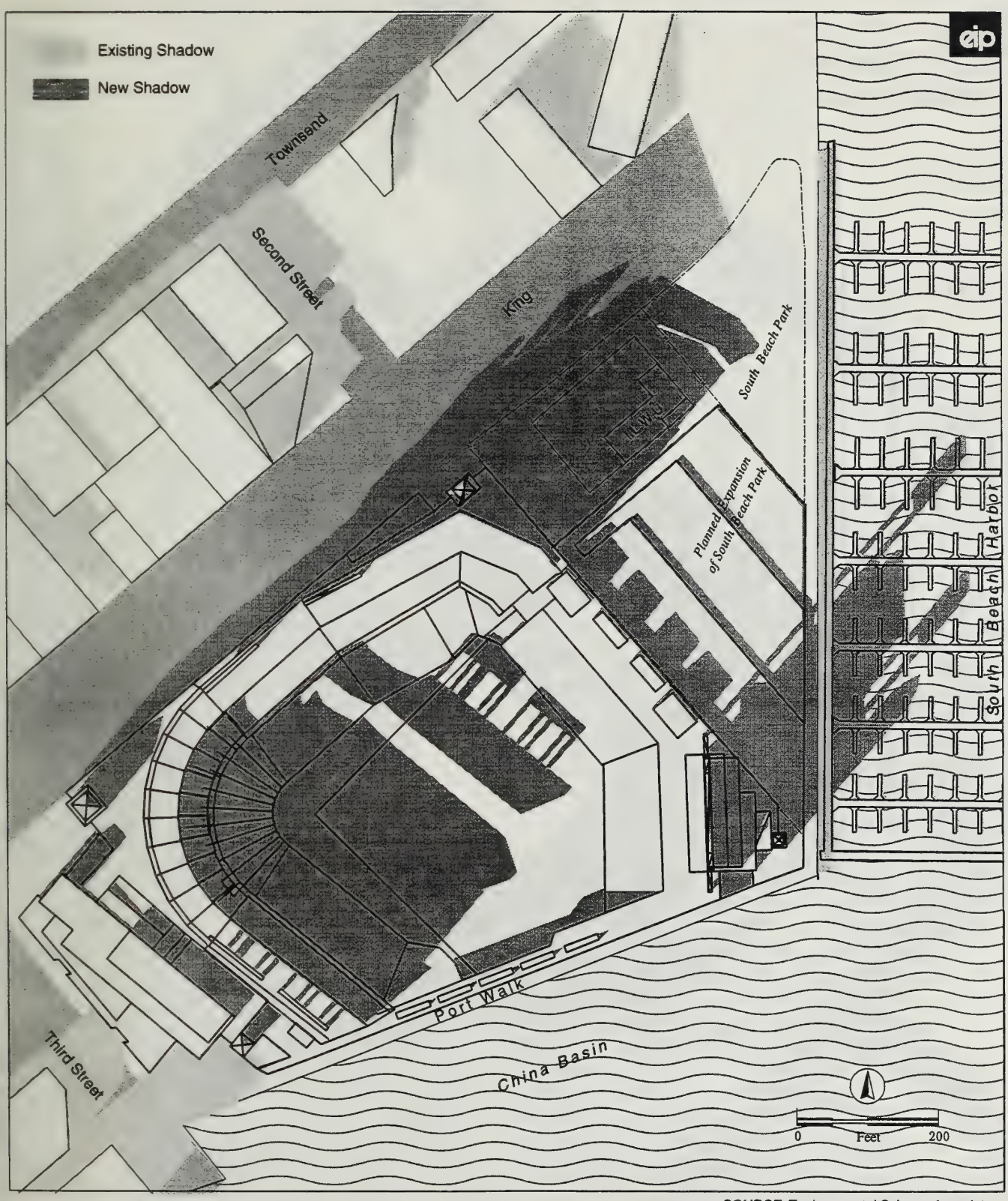
The proposed ballpark will be constructed adjacent to South Beach Marina, an existing, water-oriented recreational facility authorized in BCDC Permit No. 2-84. A number of the occupants of that marina have contacted the Commission staff raising concerns about potential ballpark impacts on the marina. These concerns have included: ... (2) shading of a portion of the marina (the shadow diagrams all end at the Bay edge, making it impossible to evaluate the severity of this potential impact). (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

Figure IV.D.2, p. IV.50; Figure IV.D.4, p. IV.53; Figure IV.D.5, p. IV. 54; Figure IV.D.8, p. IV.59; Figure IV.D.10, p. IV.62; and Figure IV.D.11, p. IV.63, in IV.D, Shadows and Wind, have been revised to illustrate project shadow effects on South Beach Harbor, and are included herein on the next 6 pages. The revised figures show 3:00 p.m. and 5:00 p.m. times when ballpark shadows could extend into South Beach Harbor. Section IV.D. text has been revised to incorporate the information as follows:

For Figure IV.D.2, Project Shadows, December 21, 3:00 P.M. PST the last two sentences of the third paragraph on p. IV.49 have been revised as follows:

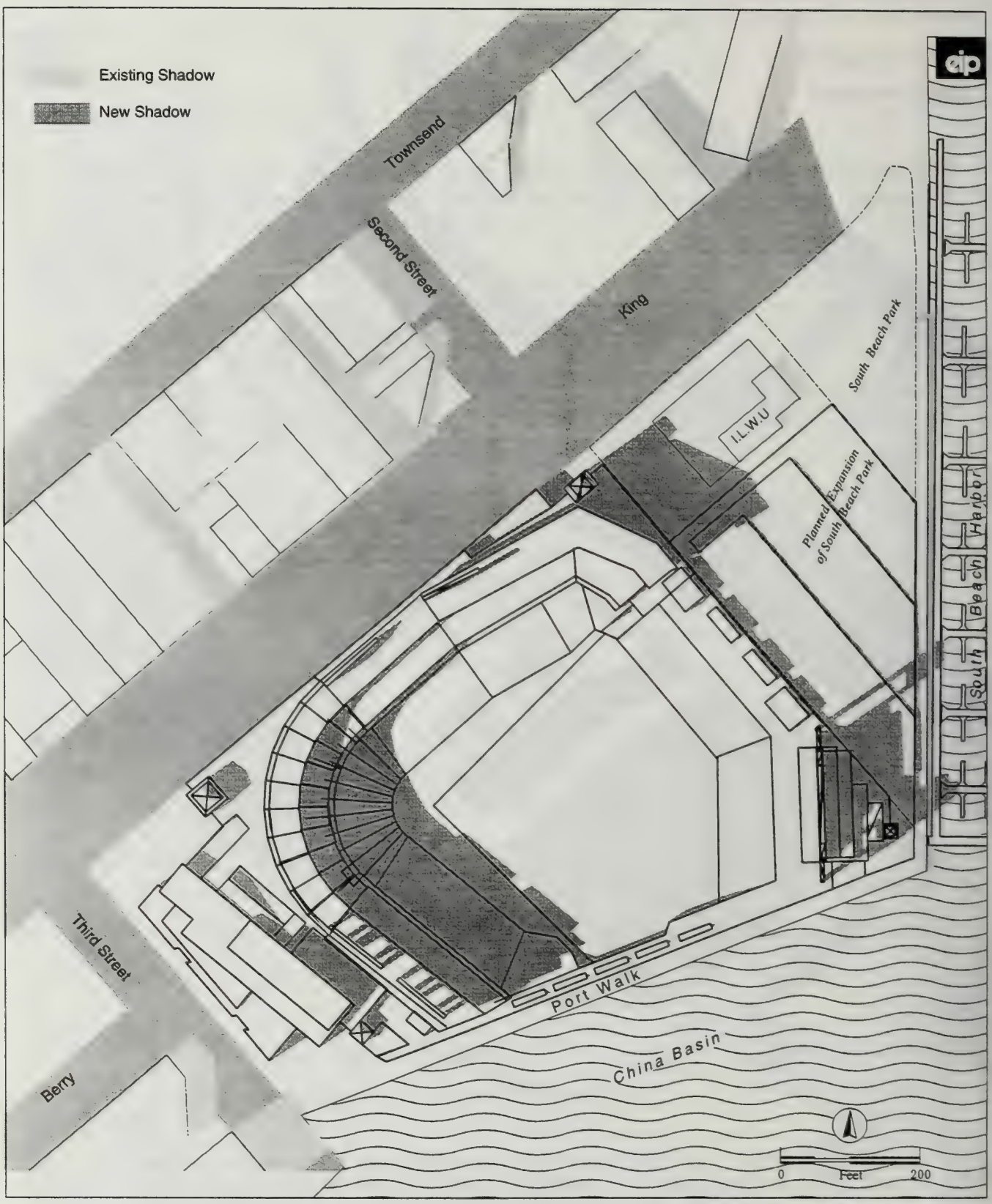
> **The restaurant and centerfield scoreboard would cast new shadow that would cover about 0.3 acre of the <u>proposed</u> extension of South Beach Park.~~, and beyond South Beach Harbor onto the Bay itself.~~ <u>The shading from the scoreboard and light standards would extend about 200 ft. into South Beach Harbor, shading parts of piers and boat slips, and open water areas.</u> ~~In total, the new shadow would cover less than 15 percent of the area of South Beach Park.~~**



SOURCE: Environmental Science Associates

GIANTS BALLPARK

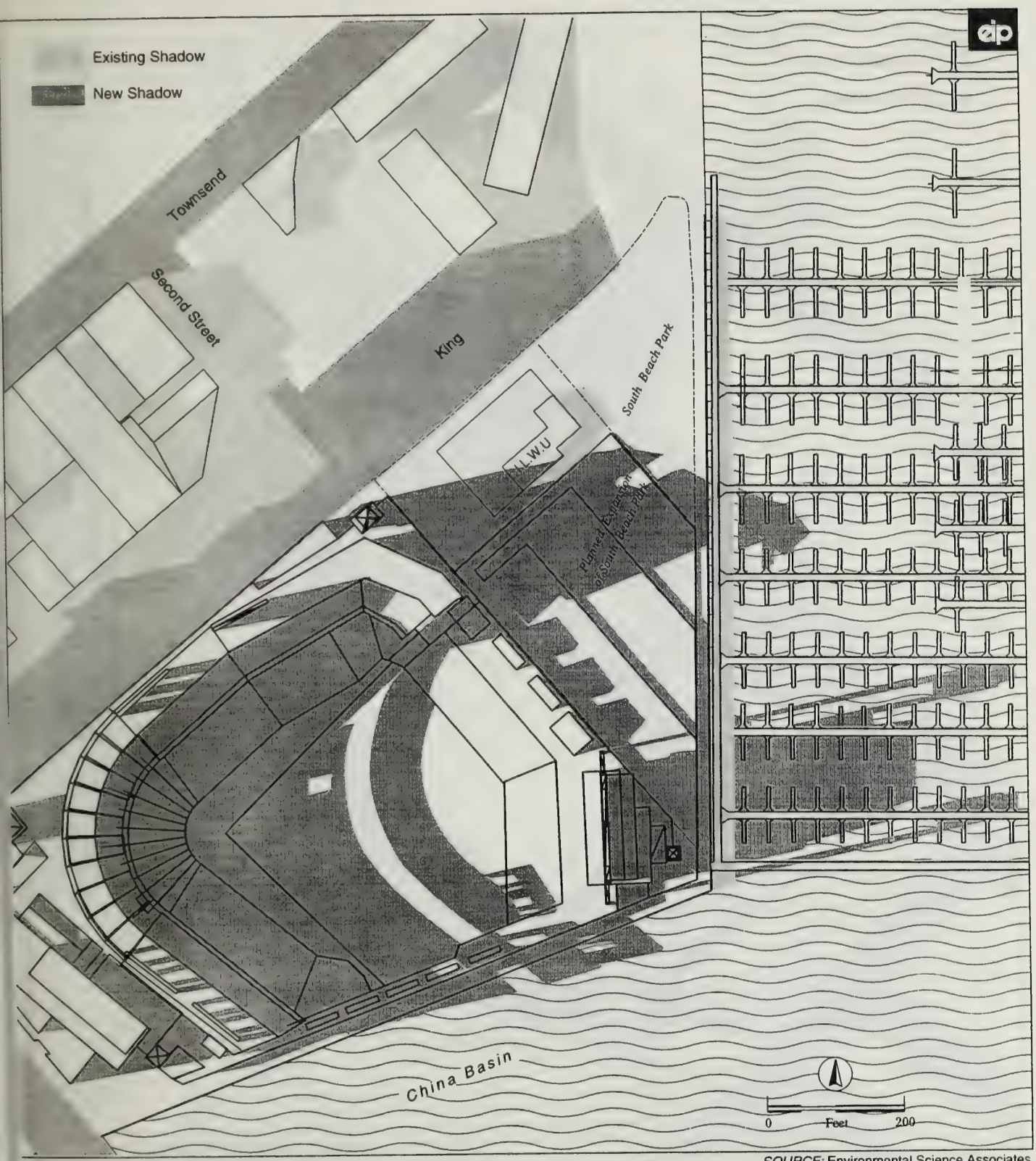
Figure IV.D.2 (Revised) Project Shadows December 21, 3:00 P.M. PST



SOURCE: Environmental Science Associates

GIANTS BALLPARK

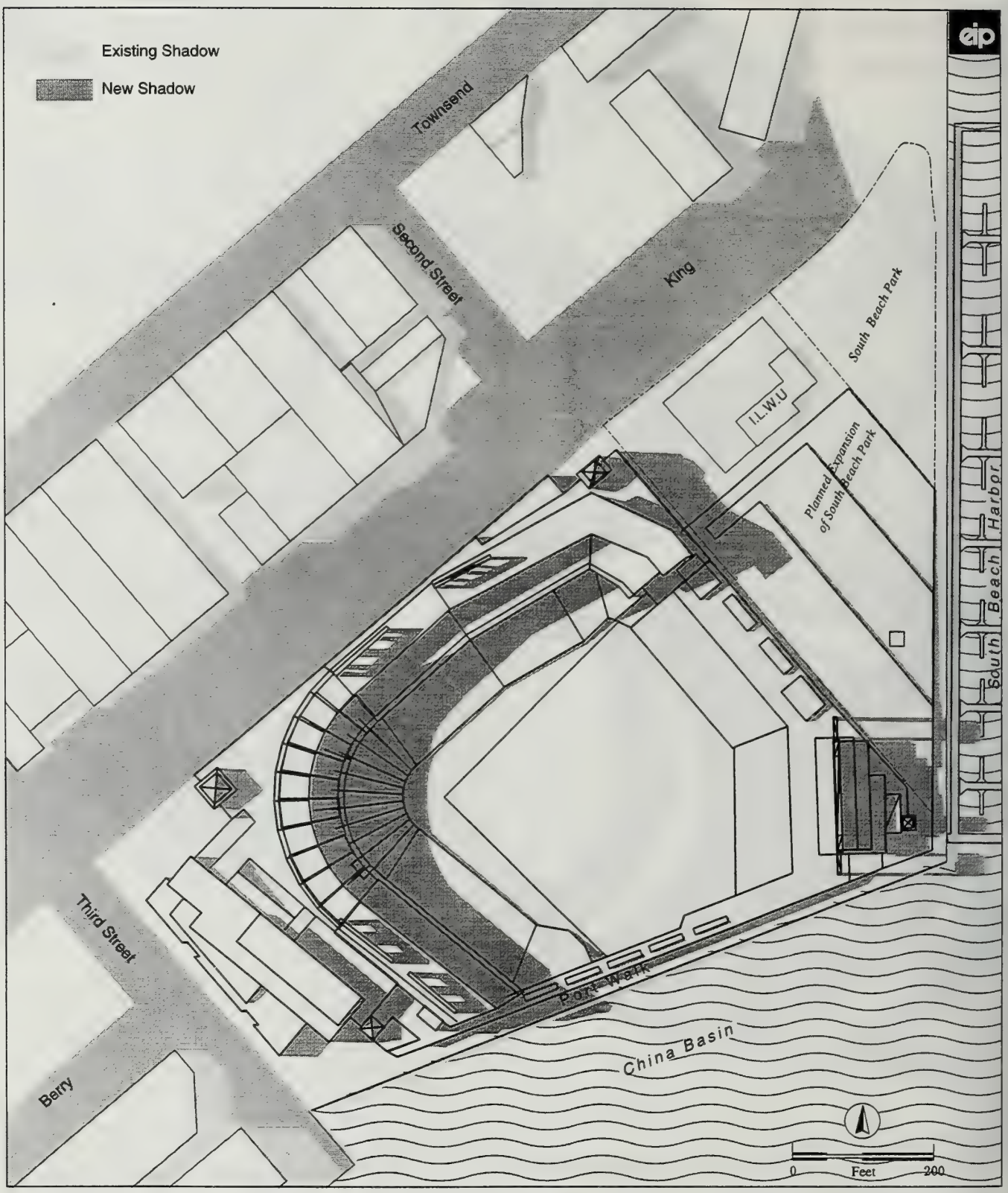
Figure IV.D.4 (Revised) Project Shadows March 21, 3:00 P.M. PST



SOURCE: Environmental Science Associates

GIANTS BALLPARK

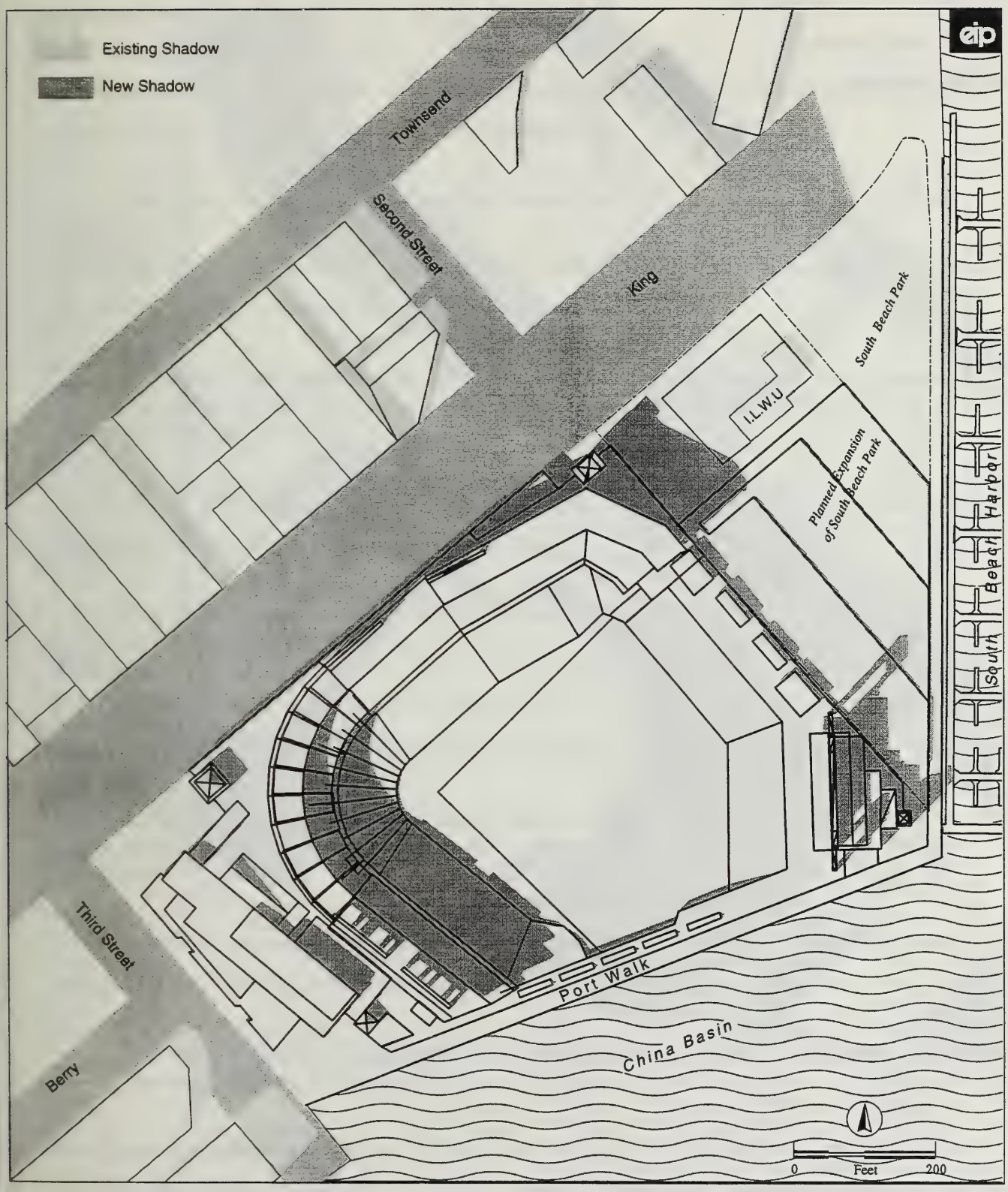
Figure IV.D.5 (Revised) Project Shadows March 21, 5:00 P.M. PST



SOURCE: Environmental Science Associates

GIANTS BALLPARK

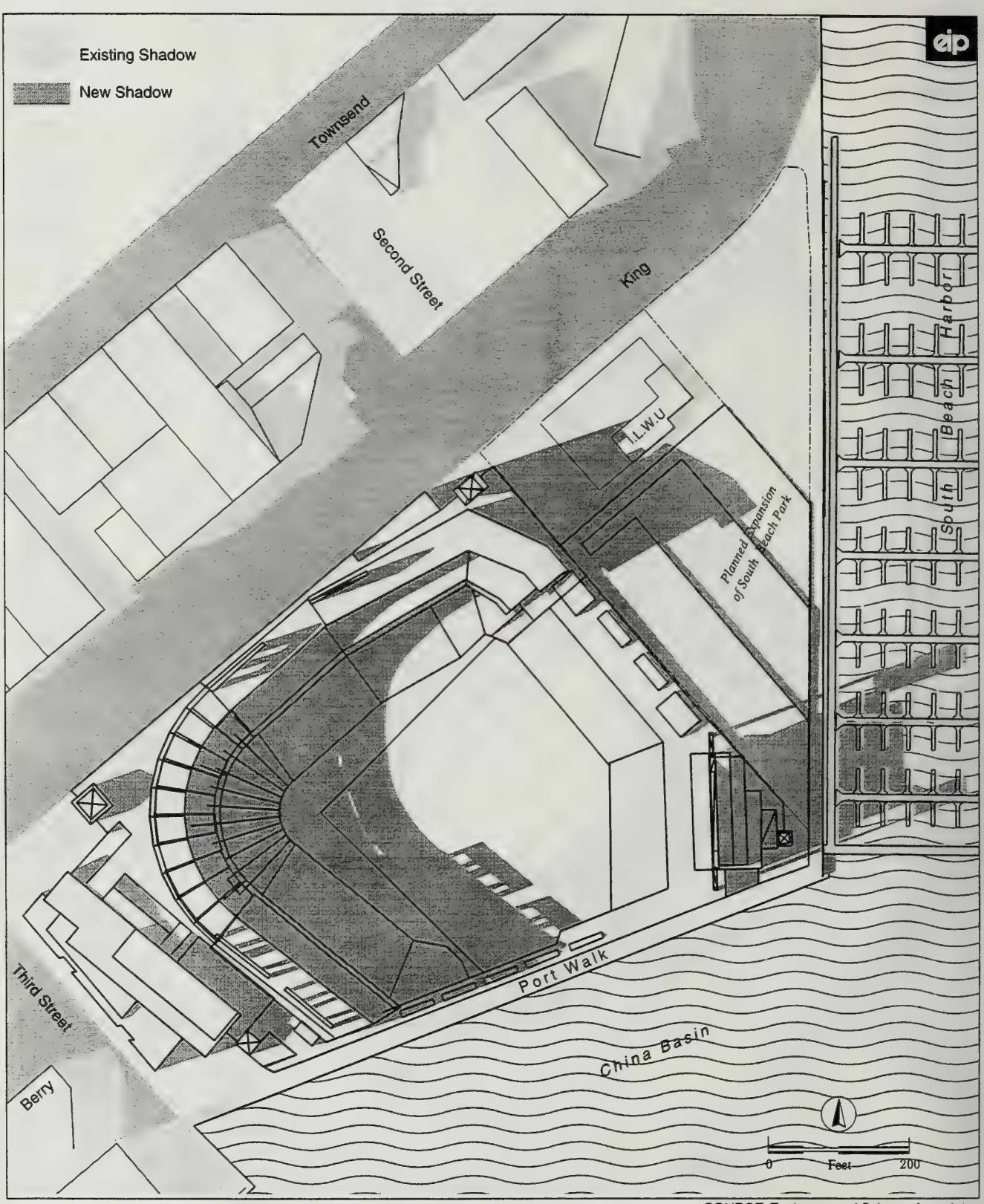
Figure IV.D.8 (Revised) Project Shadows June 21, 5:00 P.M. PDT



SOURCE: Environmental Science Associates

GIANTS BALLPARK

Figure IV.D.10 (Revised) Project Shadows September 21, 3:00 P.M. PDT



SOURCE: Environmental Science Associates

GIANTS BALLPARK

Figure IV.D.11 (Revised) Project Shadows September 21, 5:00 P.M. PDT

For Figure IV.D.4, Project Shadows, March 21, 3:00 P.M. PST, the following text has been added on p. IV.51, at the end of the second paragraph:

The light standards would shade an area about 30 ft. into South Beach Harbor.

For Figure IV.D.5, Project Shadows, March 21, 5:00 P.M. PST, the following text has been added on p. IV.55, at the end of the first paragraph:

The scoreboard and light standards would shade South Beach Harbor, extending up to 400 ft. into the harbor. The ballpark seating bowl would shade an area about 100 ft. into the harbor.

For Figure IV.D.8, Project Shadows, June 21, 5:00 P.M. PST, the following text has been added on p. IV.58, at the end of the first paragraph:

The centerfield scoreboard and light standards would shade about 40 ft. into South Beach Harbor.

For Figure IV.D.10, Project Shadows, September 21, 3:00 P.M. PST, the following text has been added on p. IV.61, at the end of the first paragraph:

The centerfield restaurant structure would shade about a 30 ft. length of the South Beach Harbor wharf adjacent to the proposed extension of South Beach Park.

For Figure IV.D.11, Project Shadows, September 21, 5:00 P.M. PST, the following text has been added on p. IV.61, at the end of the second paragraph:

The scoreboard and light standards would shade about 200 ft. into South Beach Harbor, shading parts of piers, boat slips and open water areas.

Project shadows would extend into 10 percent or less of South Beach Harbor pier, boat slips or water area, at the times illustrated. Boaters leaving or returning to slips, or occupying boats in the harbor, would experience new shadow at these times and locations. As noted in the comments, South Beach Harbor is a recreational area. However, access to boats and

slips is gated and limited to harbor tenants. These shadow effects would not occur on an area that is generally publicly accessible. The effects would occur in mid- to late-afternoon periods, rather than midday periods, which are typically peak activity times in public open space. Note that project shadow effects on South Beach Harbor are illustrated assuming the Bay at mean sea level (MSL). Shadow effects would vary somewhat, depending upon actual tide elevations for the days and times shown in the figures in the EIR.

The following has been added at the end of the first full paragraph on p. I.15 of the EIR:

> **Project shadows would extend into 10 percent or less of South Beach Harbor pier, boat slips or water areas, during mid- to late-afternoons in fall, winter and spring months. South Beach Harbor is recreational area, accessible to harbor tenants. The shadow effects would not occur in an area that is general publicly accessible.**

As discussed in Project Description, General, fifth response, and in Project Description, Scoreboard, the project sponsor is considering design changes for the ballpark that would include no centerfield restaurant, and a 16-ft. shorter scoreboard 50 ft. closer to the infield. Those changes, if implemented, would reduce project shadow effects on South Beach Harbor. Scoreboard shadows would extend at least 50 ft. less into the harbor. Depending upon the time of day and year, the 16-ft. reduction in scoreboard height would also reduce shadow length. For example, at 5:00 p.m., PST, March 21, the sun elevation would be such that a 16-ft. reduction would shorten shadows by about 55 ft. For March 21 and September 21 at 3:00 p.m., and June 21 at 5:00 p.m., the potential design changes would eliminate project shadows on South Beach Harbor. For March 21 and September 21 at 5:00 p.m., the design change would reduce effects by about one-fourth to one-half, compared to the proposed project conditions described above.

Pages IV.46 - IV.46 of the EIR discuss existing open space in the project vicinity, including South Beach Park, and of City Planning Code Section 295, limiting shadows on open space under the jurisdiction of the Recreation and Park Department. Chapter II, Project Description, pp. II.27 - II.28 of the EIR discusses the eight Priority Policies in Code Section

101.1, and notes that the Planning Commission or Planning Department would make a determination of the project's conformance with the Priority Policies.

Shadow Effects on South Beach Park

Comments

The study does not indicate which elements of the ballpark will cast the greatest amount of shade on South Beach Park, but it seems clear from the figures that it is the structure at the Southeast corner, the combined bulk of the scoreboard and restaurant, that will have the greatest shading effect. How much adjustment can be made in the bulk of these two structures in order to benefit the Park? Can some aspects of the scoreboard be distributed in other locations inside the stadium so that the bulk protruding above the stadium will be smaller?

Because the restaurant and the scoreboard are designed together, the excessive bulk of the scoreboard and the unnecessary height of the restaurant combine to create a bulk that casts a substantial shadow. How much reduction in shadow would there be if the scoreboard were less bulky and the restaurant less high? For example, study a scoreboard with dimension of 40' x 110', or 30' x 80', as well as a restaurant one floor shorter. How much less shadow would then be cast on the park? (San Francisco Tomorrow Waterfront Committee)

Shadow impacts on the Park and the Harbor must be completed and if the relocated advertising scoreboard height causes shading on the Park and Harbor, it should be moved. A single year round shadow limit chart needs to be added. (L. Joseph Boss)

Response

Shadow analyses can include a year-round shadow trace, referred to in the comment as "single year round shadow limit chart." The year-round trace illustrates the maximum extent of project shadow as though cast on the ground without existing intervening buildings, for the period of one hour after sunrise to one hour before sunset. The trace is typically used to identify open space that could be affected by project shadows. Because the EIR identifies South Beach Park as open space that could be affected by project shadows, and describes those effects, a year-round shadow trace would not add useful information to the EIR. The analysis provided in the EIR illustrated actual shadow conditions at specific times. Please see also Shadows, Shadow Effects on South Beach Harbor, discussing shadow effects of a relocated and reduced-height scoreboard, and elimination of the centerfield restaurant. The

potential design changes would reduce project shadow effects on the proposed extension of South Beach Park, described in the EIR, for December 21, noon; March 21, noon; June 21 at 3:00 p.m. and 5:00 p.m. PDT; and September 21 at 3:00 p.m. As discussed below, the EIR thus discloses project shadow effects on South Beach Park and its proposed extension. As discussed in the Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension, the SFRA is considering development of surface parking, rather than open space, in the area previously described as a proposed extension of South Beach Park. If a parking use were developed, project shadow effects described for the proposed extension of South Beach Park would occur on that parking area.

Comment

Figure IV.D.1: This and all shadow drawings: includes part of the proposed expansion of the park, but omit[s] the proposed structure which will have its own shadow impacts that will worsen conditions; has strange wedge shape for driveway in park -- what is this?

Page IV.64: With the limited information available from the graphics -- which omit the harbor and the proposed building in the park expansion -- it is evident that the ballpark will seriously shadow the marina and the public park. Those shadows will also alter wind conditions in the harbor and make use of the harbor less inviting in the late afternoon.

You must find that the ballpark itself has major shadow impacts. It is therefore imperative that shadows not be worsened by adding a further structure in the park which would increase that shadowing. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

Project shadow effects on South Beach Park and its proposed extension are discussed in IV.D. Shadow and Wind, pp. IV.46 - IV.64, and illustrated in Figures IV.D.1 to IV.D.11 in the EIR. The text and figures describe the range of shadow conditions that would occur on South Beach Park and the proposed extension of the park. At the 3:00 p.m. and 5:00 p.m. times studied, ballpark shadows could reach the park or its proposed extension. Most effects would occur on the proposed extension of, rather than the existing, South Beach Park. For example, see Figure IV.D.5, Project Shadows March 21, 5:00 P.M. PST, p. IV.54.

The EIR thus discloses project shadow effects on South Beach Park and its proposed extension. As discussed in the Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension, the SFRA is considering development of surface parking, rather than open space, in the area previously described as a proposed extension of South Beach Park. If a parking use were developed, project shadow effects described for the proposed extension of South Beach Park would occur on that parking area.

The comments concerning other proposed structures in South Beach Park that could affect shadow conditions appear to refer to earlier, conceptual plans that the Redevelopment Agency had considered for the area that included a maritime-use building fronting the harbor as part of the proposed extension of South Beach Park (see EIR, p. A.5 of the Initial Study). That use was later dropped from SFRA plans for the extension of the park and was not evaluated in the Draft EIR. Therefore, the shadow analysis does not include such a structure. See also Shadows, Shadow Effects on South Beach Harbor, concerning current SFRA plans for South Beach Park.

The wedge-shaped area near the King Street-Second Street corner of the ballpark shown in the shadow graphics is extraneous, and has been corrected in the revised shadow graphics included herein. The correction does not affect the accuracy or completeness of the shadow graphics or the effects discussed in the EIR.

See also Shadows, Shadow Effects on South Beach Harbor, discussing shadow conditions in South Beach Harbor.

Comment

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: ...[b]allpark shadows. (Ship Clerks' Association, Local 34, ILWU)

Response

Figures IV.D.1 - IV.D.11 illustrate project shadow effects on the ILWU parking lot and building part of the ballpark. The project would shade the ILWU site in afternoons in fall, winter, and spring months. These effects are noted in the text on pp. IV.49, IV.51, IV.55, IV.58 and IV.61.

Shadow Effects of Scoreboard

Comments

Can you explain how the square footage on the scoreboard would be used - how much for stats, how much for scores, advertising and other uses? Without knowing how the 60' x 160' area is used, it is impossible to evaluate whether a smaller scoreboard could serve the essential purpose of conveying information. A smaller scoreboard would cast a smaller shadow. (San Francisco Tomorrow Waterfront Committee)

There will be year-round shadows from the stadium billboard -- scoreboard, which is above the four-story restaurant. Above the restaurant, the billboard will be 160 feet wide and 60 feet high. These shadows, combined with the wind, will make it cold and uncomfortable for people wishing to sit down in a sunny park. The restaurant and the billboard and score boards should be reduced in size to cast less of a shadow on the park. (Jane Morrison)

Response

Shadow effects of the proposed centerfield scoreboard are discussed on pp. IV.46 - IV.64 of the EIR, and illustrated in Figures IV.D.1 - IV.D.11. As discussed in Shadows, Shadow Effects on South Beach Harbor, the project sponsor is contemplating a revised ballpark design that would eliminate the centerfield scoreboard, reduce the height of the scoreboard by 16 ft., and relocate it about 50 ft. closer to the infield. Those changes would reduce the area of South Beach Park or its proposed extension shaded by the scoreboard. The scoreboard shadow effects presented in the EIR would be the worst-case shadow conditions expected to be created by the project. As discussed above, most project shadow effects on South Beach Park would occur on the proposed extension, which the SFRA is contemplating as a parking area, rather than open space.

Please see Visual Quality and Lighting, Lighting Effects - Scoreboard, which discusses visual quality and lighting effects of the scoreboard, including a description of scoreboard components.

Shadow Effects - Significance

Comments

IV.46 - Shadows: A Redevelopment Plan has an expiration date. So just because the park is currently under the Agency's jurisdiction doesn't mean it will remain so indefinitely.

The stingy analysis of shadows, based on a technicality regarding exactly which agency owns the public park, is inappropriate. This is a major public park which was created to provide mitigation from the congested area downtown and a public amenity along the waterfront. This is an EIR, not merely a technical application of Proposition K. You must look to the intention of the voters in San Francisco to protect sunlight on public open spaces. Ditch this legalistic approach. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

IV.49 - shadows on park: The EIR conclusion that there is no significant impact from shadowing is totally incorrect. Even though the restrictions of Proposition K may not prohibit any shadows on the park, the EIR should use the standard approved by the voters as to what is significant and apply it here. The shadows described here and on subsequent pages show that shadow impacts will significantly affect users of the public open space and should be minimized.

You must find significant shadow impact.

Shadows along King Street facade of ballpark, evident in most renderings show that those shadows will make walking along that sidewalk less desirable when the ballpark is not open. It will be colder and windier, as well as a substantial expanse of "non-activity." The area under the arcade will be more threatening, particularly at night. The text, e.g. IV.55, June 21, first paragraph, downplays these negative impacts -- new shadow covering "less than" 800 feet?

IV.64 - conclusion re shadows: Proposition K technicalities are not the only standards which should be applied. It is absolutely unsupportable to find, based on a technical, legalistic interpretation of Proposition K, that this project has no significant shadow impact. The renderings make it evident that the ballpark will cast into shadow for a significant portion of the day and for a significant portion of the year the major public park in South Beach and the sidewalk adjacent to the ballpark on King Street. These Are Significant Impacts. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

Page IV.6 identifies open space in the project vicinity, the jurisdiction of the open space (San Francisco Recreation and Park Department or San Francisco Redevelopment Agency), and correctly states that City Planning Code Section 295 is applicable only to properties owned by, or under the jurisdiction of, the Recreation and Park Department.

Pages IV.46 - IV.64 and Figures IV.D.1 - IV.D.11 describe project shadow effects on streets, sidewalks and open space in the vicinity, including effects on South Beach Park and its proposed extension. Further information on project shadow effects on South Beach Harbor is provided herein in Shadows, Shadow Effects on South Beach Harbor.

Pages IV.61 and IV.64 summarize project shadow effects on South Beach Park and conclude, on the basis that South Beach Park and its proposed extension are not subject to City Planning Code Section 295 (applying only to property under the jurisdiction of the San Francisco Recreation and Park Development), that project shadow effects would not be significant. As discussed in Shadows, Shadow Effects on South Beach Harbor, most project shadow effects would occur on the proposed extension of South Beach Park. If a parking area, as under consideration by SFRA, were developed, project shadow effects would affect that parking use, rather than existing open space at South Beach Park.

The commentor's opinion concerning the significance of project shadow effects is noted. Page VI.1, in Section VI.A, Significant Environmental Effects That Cannot Be Avoided If The Proposed Project Is Implemented, states:

> "The findings of significant impacts are subject to final determination by the Planning Commission and the San Francisco Redevelopment Agency Commission as part of the certification process for the EIR. This chapter in the Final EIR will be revised, if necessary, to reflect the findings of the Planning Commission and the Redevelopment Agency Commission."

In determining the significance of project shadow effects, the commission may consider the information in this EIR, including the time of day of shadows, the area shaded, the potential

plans for a parking area in the previously proposed extension of South Beach Park, and the reduction in project shadows that would result from proposed design changes eliminating the centerfield restaurant, reducing the height of the scoreboard, and the relocation of the scoreboard 50 ft. closer to the infield.

WIND

General

Comments

Most of the data presented in the EIR volumes was modeled, using computer simulations and hopefully all (see wind element) models were calibrated and data verified by on-site observation. Modeling is sound, provided the underlying assumptions are valid. (Silva B. Creg)

Page IV.73 2nd line... wind is..."expected to change (increase or decrease?) by 3 mph." (Rincon Point South Beach CAC)

Page IV.74 Note 1. Is date of report correct? February 14, 1996, or is it 1997? (Rincon Point South Beach CAC)

Response

The analysis is based on the use of scale models in a wind-tunnel, to simulate real wind conditions around the project. This is the standard methodology used in San Francisco to evaluate the wind effects of large structures, especially high-rise buildings, in the Downtown.

Section IV.D. Shadow and Wind, pp. IV.64 - IV.74 of the EIR, presents wind-tunnel tests for the project. The text on p. IV.64, notes that the tests described on pp. A.55 - A.90 in EIR Appendix B, follows methodology specified in City Planning Code Section 148. As discussed in Appendix B, pp. A.58 - A.63, the methodology includes use of historic meteorological data for wind directions and velocities in San Francisco; each wind direction is modeled in the wind tunnel, and resulting measured wind speeds are integrated mathematically to provide the single results at each test location. In addition, the wind speed computations include factors to account for differences in wind speeds that occur near the site and those at the location where wind speeds were measured at the Civic Center weather station. The wind tunnel tests and results completed by Environmental Science Associates and Bruce White, Ph.D., as cited on p. A.55, were also reviewed by Donald J. Ballanti, Certified Consulting Meteorologist (under contract to the San Francisco Giants).

The text on the second line of p. IV.73, "be expected to change by 3 mph or less" indicates both increases and decreases in speed. This form of reference is used in the EIR to indicate range of change.

The editing error in Note 1, Draft EIR p. IV.74 has been corrected as follows:

> 1. **This section is based on a study entitled *Wind-Tunnel Test of the Pacific Bell Park Project*, ~~Februrary 14, 1996~~ March 6, 1997, jointly prepared by Charles B. Bennett, of Environmental Science Associates, and Bruce R. White, Ph.D. A summary of the study is included in Appendix B, Wind; a copy of the report is on file for public review at the Office of Environmental Review, Planning Department, 1660 Mission Street, San Francisco.**

Wind Effects

Comments

The cumulative impact of the shading of the Park with the strong prevailing winds should be studies. Winds that might be comfortable when the sun is shining become intolerable when the sun is removed. If the ballpark will indeed cause a small decrease in the speed of the wind (although not enough to attain even pedestrian comfort levels -- see Appendix B., Page A.75) that decrease will be more than offset by the increase in shadowing. This combined effect should be studied in the DEIR. (San Francisco Tomorrow Waterfront Committee)

Effects of wind and shade on South Beach Park. Although the Giants survey shows a reduction of wind speed, the minimal decrease in wind will not be enough to overcome the combined effects of wind and shade on South Beach Park. This will greatly diminish the park's usability and desirability. (Andy Katz, San Francisco Tomorrow Waterfront Committee)

Response

The specific individual effects of wind and shadow are described in Section IV.D. Shadow and Wind, of the EIR. No study of the combined effects was performed, as it was not considered necessary to assess adequately the potential environmental impacts of the proposed project.

Wind speed, air temperature and incident sunlight, as well as the activity level and the clothing worn by individuals strongly influence their comfort or discomfort outdoors. Even in winter months in San Francisco, air temperatures rarely become low enough such that wind chill becomes an important factor; when it does, any increase in shadow would not be an important factor, because persons would be experiencing cold conditions in or out of shading.

At all times, the activity levels and the clothing worn by individuals will be the most important factors determining personal comfort. Shadow would play a role primarily to the extent that park visitors would not chose to sit in the shade if it were too cold and would chose to sit in the shade if it were too warm. In San Francisco, the spring and summer daily wind pattern generally are calm in the morning; winds increase and build throughout the afternoon until about 6 p.m., and then diminishes by later in the evening. Figures IV.D.1 through IV.D.11 of the EIR, which illustrate project shadow effects show that project shading of South Beach Park or its proposed extension, would occur late afternoon only, as the 3 p.m. and 5 p.m. shadow diagrams show. In the morning and at noontime when the winds are generally much lower, activities in the Park could not be affected by project shadows. Later in the afternoon, after the wind naturally increases, both would combine to influence Park visitor comfort. Note that most project shadow effects in South Beach Park would occur in the proposed extension of South Beach Park, described on p. IV.46. (As discussed in Project Description, Redevelopment Agency Planning for Service Drive, South Beach Harbor Parking, and South Beach Park Extension of this document, the San Francisco Redevelopment Agency is currently contemplating a number of options for that area, including surface parking, rather than open space. If that were the case, project shadow effects would occur on a vehicle parking area at those times.)

Cooler late afternoon and evening winds associated with a rapidly-approaching fog bank also typically occur in San Francisco. Under such fog conditions, the ballpark structure would not cast shadow to add to discomfort.

The existing trees in South Beach Park are currently a source of late afternoon shade for the existing open space. The trees were not included in wind and shadow modeling in the EIR. The project conditions reported in the EIR are therefore conservative: They do not account for wind-screening effects of trees, nor of existing shadow cast by the trees.

Comments

Page IV.64 last paragraph. (Wind) ...all test locations, including those in the proposed South Beach Park, are considered to be pedestrian areas, rather than sitting areas.

Appendix B., Page A.63. None of the test locations correspond to representative potential outdoor seating locations; all accessible test locations, including those in South Beach Park, are considered to be walking and activity, rather than sitting areas.

To assume that people will not be sitting in a park is a wholly false assumption. This study must be amended to include wind impacts for stationary park users. (San Francisco Tomorrow Waterfront Committee)

IV.72 - Winds in park: Please explain exactly where in the South Beach park the wind problems would be felt. It is especially frustrating that you provided a map with numbered locations and then never mention those locations by number in the text so that it is possible to understand the impacts. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

IV.64 - Wind: Why were no seated locations in the public park analyzed? The City has added a large park for the public to enjoy and much of that enjoyment occurs from sitting down in that setting. Seated locations should be included. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The comments note that the EIR wind analysis did not identify any areas of South Beach Park, or its proposed extension, as a "public seating area" for which a 7 mph comfort criteria is identified in City Planning Code Section 148. The public seating criterion is usually applied to formal seating areas, which have benches or which may have chairs and tables. Since none of these areas were identified, the pedestrian criterion was used for all locations.

It is expected that people would sit or lie on the grass or on walls or other structures in parks. Typically, a person is much less exposed to the wind when sitting or lying on the ground than when sitting on an open bench or standing, as wind speed is diminished very close to the ground. Thus, it is inappropriate to consider the pedestrian comfort for those who chose to lie in the grass as well as for active park users.

The wind-tunnel test results presented in the EIR do not depend on the criterion that is related to any given location, whether it is considered a pedestrian area or a seating area. Table X.13.1, Pedestrian Comfort Analysis for the Project, in Appendix B of the EIR shows existing and project wind speeds for locations in South Beach Park, including test locations 41-44, and 68. (Locations 41, 42, and 49 would be in the proposed extension of South Beach Park, now potentially planned for project parking.) The table illustrates that existing wind speeds in those locations currently exceed the 11 mph pedestrian criterion, and would generally be reduced by project conditions. No points in the park would meet the 11 mph pedestrian comfort criterion or the 7 mph seating criterion (if the latter were applicable) with existing or project conditions.

Comment

IV.68: It is difficult to understand the information on impacts. Please provide a graphic showing problematic locations. The location at Pier 40 where impacts would not meet pedestrian comfort criterion is heavily used by pedestrians enjoying the waterfront. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The analysis presented in Section IV.D. Shadow and Wind, contains a summary of the wind study contained in Appendix B. Figure IV.D.12, EIR p. IV.65, Wind Test Location Plan, identifies wind tunnel points generally described in EIR pp. IV.64 - IV.74. Page 64, last paragraph, refers the reader to the same figure in Appendix B, and the Appendix Tables X.B.1 and X.B.2 that present wind tunnel results by test location. The Appendix B text, pp. A.63 - A.89, identifies changes in wind condition at each relevant test location. Hazard

condition points are identified by location number. Pier 40, north of South Beach Harbor, provides pedestrian access, is about 700 to 800 ft. from the ballpark, and includes pedestrian access. The wind-tunnel analysis did not include test points at Pier 40, as ballpark wind effects would not be expected to be detectable at that distance. Wind test location 69, at the northerly end of South Beach Park, is the closest test location to Pier 40. As can be seen in Appendix Table X.13.1, p. A.68, the existing 10 percent exceeded wind speed at point 69 is 18 mph, and would be about 17 mph with the project, and about 13 mph with cumulative development. The project would not be expected to create adverse wind effects at Pier 40.

Wind Conditions - Queuing

Comment

IV.69: Would unpleasantly windy conditions affect queuing patterns for the ballpark? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

It is possible that wind conditions would affect queuing patterns. Given that there is more than one entrance to the ballpark, it would be expected that during windy periods, ballpark patrons would choose to go to a downwind entrance that would be more protected from the wind. The main pedestrian entrances to the ballpark would be at the four corners, at King near Third; King near Second; the Port Walk near China Basin, and Third Street near the Lefty O'Doul Bridge. These generally correspond to wind test locations 57, 60, 50, and 17, on Figure X.B.1, Appendix A, p. A.64. Wind speeds at those locations would range from 10 to 17 mph with project conditions, and from 9 mph to 15 mph with cumulative conditions. The Third/King, and the Port Walk entrance would have lower speeds than the King/Second or at the Lefty O'Doul Bridge. Given the range of wind speeds that would be projected to occur at locations around the ballpark, it would not be expected that queuing conditions would be uncomfortable in a particular location. In general, lines for people entering the ballpark would be expected to move quickly, and wind conditions in those areas

would not affect patrons adversely. The wind speeds near these main pedestrian entrances would in general be within the range speeds found in the ballpark vicinity, as described on p. IV.66 of the EIR.

As noted in Wind, Wind Effects, winds generally start out calm in the morning, build throughout the afternoon until the peak is reached about 6 p.m., and then diminish later in the evening. Afternoon games would find fans entering the ballpark mid-day, before the winds have picked up, so winds shouldn't normally affect queuing for day games. Wind may be more a factor for arrivals for night games before 7 p.m., as winds generally would be at their daily maximum and if the air temperature were low and fog present.

Wind Speed Hazard Conditions

Comment

IV.70: It is impossible to understand the locations which would be hazardous without a graphic explaining it. Where exactly will winds be 36 mph? How many people will be affected? What people? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The locations where the one-hour per year wind speed would exceed the criterion of 36 mph are presented in Table X.B.2, described on Appendix B, pp. A.55 - A.90 and shown on Figure X.B.1 of Appendix B.

Page IV.70 of the EIR identifies hazard exceedance locations on Locations 1 and 4, as also shown on Figure IV.D.12, p. IV.65. Location 1 would be on the roof of the Pavilion Building, and would not be a publicly accessible area. Location 4 would be on a pedestrian crossing between the Pavilion Building and the upper Concourse walkway in the ballpark. This upper concourse area is shown around the seating bowl in Figure II.D.1, p. II.9 of the EIR.

Note that the comfort criteria are defined for wind speeds that would be exceeded 10 percent of the time, as discussed on p. IV.66 of the EIR. The 10 percent exceeded winds for those locations are presented in Table X.B.1, p. A.66; 90 percent of the winds would be at speeds less than the speeds shown in Table X.B.1.

Hazardous wind conditions refers to infrequent events that are projected to occur up to 90 hours per year with the project. About 67 hours would be related to Location 1, on the roof of the Pavilion Building. The criterion is 36 mph for one hour per year. It is most likely that such an wind event would occur during a storm. This could be anytime, day or night, but is more likely to occur during winter. During a storm, individuals would be less likely to go outdoors, and those relatively few who do would expect to deal with strong wind conditions. Extreme wind events that would be expected to occur during winter storms would not affect patrons attending baseball games.

As noted on p. IV.70 of the EIR, second paragraph, "on-site structures such as screens, arbors or trellises could be designed and constructed to eliminate hazardous wind conditions."

South Beach Harbor

Comments

Impacts on use and enjoyment of the South Beach Yacht Harbor are also not adequately covered, including...wind... (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Anyone who has tried to bring a boat into our harbor realizes that the cross wind is very significant. Therefore, I am very concerned about the wind velocity and direction while docking safely and preventing accidents to my investment and to others. I have been informed that the current plan of the garage and grassy area calls for removing the 45 trees that now act as a partial wind break. This would be a big mistake. Since the Draft EIR does not study the wind velocity as it affects the boats getting into their slips, I strongly recommend that all of those trees should be saved and that additional trees should be

planned. The Tunnel effect of the building and the stadium walls could very well cause additional problems to boaters. This needs to be modeled and determined. (David Davis)

Wind impact study needs to include the entire harbor area. (L. Joseph Boss)

[T]he wind study has to be expanded to include the whole harbor. The shadow impacts, I mean it is appalling. Here is the wind test, by the way. Again, they don't even show the whole harbor, but there was enough paper to print it on. (L. Joseph Boss)

Though it has been brought up at several CAC meetings and at public meetings, the DEIR has ignored the existence of the South Beach Harbor...wind problems must be studied as to the effect on this existing Maritime use of the immediate area. (Janet Carpinelli)

[T]he draft EIR virtually ignores the South Beach Harbor. It is, to me, really quite a glaring omission. That is the only facility that is physically adjacent to the park at all. They did not take wind studies out in the harbor. They stopped at the water's edge....I don't know how you don't do wind in a harbor where there are wind-driven boats, but they didn't do that. I think they have to go back and do it. It just is...crazy that they didn't take care of that better. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

This omission is particularly glaring in light of the fact that the marina is the only development that is physically adjacent to the ballpark itself. Amazingly to me, no analysis was done on the effects of the ballpark on the harbor in terms of wind (wind measurements were done throughout the area--but not in the harbor itself)... (Rick Mariano)

I don't know how many people out here have boats, but I have a boat which I call my biggest asset. It has to come into a harbor with a cross wind. That's one problem existing in the harbor now. So, if you ever try to bring your asset into a berth, which is about,...14 feet wide, without smashing into the boat below you, down wind, or above you, up wind, it is very difficult to do without getting scratches.

So...my concern has to do with the wind. There was a wind study done and...the wind study stops at the promenade, does not go into the harbor itself, which is really strange because you are going to have a tunneling effect of the wind coming through the parking lot, going around the recreational building, going around the big walls. And it could very well increase into our boating area, which could be a real disaster.

I don't think anybody out here would say that you want to be liable for my scratches due to the lack of concern about the wind. Now, the wind right now is partially blocked by 45 trees that go along the promenade, 45 trees. It doesn't go a great job, but it does some. And I have been told that these 45 trees can no longer be there. That, to me, is an oversight of the whole plan. They should be able to remain, and if you really want to make friends out of boaters, plant a couple hundred more. (Dave Davis)

Study conclusions stop at the east promenade and must include the entire harbor. Was the study remodeled with the latest scoreboard configuration? When were the wind samples taken, at which time(s) of the year? (Mark Miner)

Figure IV.D.12: A sailing marina is a wind dependent use. The omission of any wind analysis for the marina, particularly the locations where boats are maneuvering into the harbor is absolutely inexcusable.

You must add several points of analysis in the marina and should consult with the boaters in the marina for the precise locations.

Do the wind projections in this section take into account the proposed development in the expanded South Beach park? (Sue C. Hestor, Advocates for South Beach Harbor)

The boaters should not be denied the reasonable use and enjoyment of their real property as a result of the problems that will come up during the course of construction. The wind in the report is accurately described as coming out of the northwest and out of the west, and it is highest during the summer. I do not understand why it is that the wind was not measured within the harbor, and why it was not measured during the peak periods of wind, which is the afternoon in the summer. As far as I can tell, these studies were done during periods when the winds are relatively slight. (Kirk Kelsen)

The proposed ballpark will be constructed adjacent to South Beach Marina, an existing, water-oriented recreational facility authorized in BCDC Permit No. 2-84. A number of the occupants of that marina have contacted the Commission staff raising concerns about potential ballpark impacts on the marina. These concerns have included: ... (5) disruption of winds that are favorable for maneuvering boats in and near the marina. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Impact on the South Beach marina, including wind patterns...must be considered and minimized. (Abigail A. Grafton, M.A., M.F.C.C.)

Response

The wind tunnel study conducted for the EIR provides sufficient information to determine that the ballpark would not increase winds in South Beach Harbor. With respect to the general wind effects of the ballpark as experienced in South Beach Harbor, any effect that would result from the ballpark structure would diminish in magnitude as the distance from the ballpark increases.

The effects that are described for South Beach Park (Locations 41, 42, 44), along the south side of King Street (Locations 46, 49), and near the harbor (Locations 43, 47, 68, 69) would represent the maximum effects that would be expected from the ballpark. The wind speeds changes are reported in Table X.B.1, pp. A.66 - A.68 of Appendix B, for locations shown in Figure X.B.1, p. A.64.

For wind test locations nearest the harbor (43, 47, 68, 69), wind speeds with the project at two locations (43, 47) would decrease compared to existing conditions, or would generally remain the same (68, 69). The latter data are reasonable, as those points 68 and 69 are relatively distant from the ballpark (about 500 to 700 ft.). Potential wind effects in South Beach Harbor are discussed further below.

The reference to a "cross wind" at the harbor entrance is a question about a specific wind condition, whether it is a northwest wind, a southwest wind, the summer afternoon west wind or a wind from another direction. The specific effects would depend on that wind direction. The most common and strongest winds in San Francisco are the northwest, west-northwest, west and west-southwest winds. It is possible to evaluate the wind-tunnel test data for each of the tested wind directions -- northwest, west-northwest, west and west-southwest -- to determine the magnitude of the changes that would result from the project for each specific wind direction.

The northwest wind flows generally parallel to Second Street. The harbor, and especially the harbor entrance, are not directly downwind of the ballpark, so no effects should result. The southernmost slips in the harbor are close enough to the ballpark that the structure could affect the wind reaching those slips. Directional wind data from the wind-tunnel tests indicate that northwest wind speeds at locations along King Street (Locations 46, 49) would increase 5 percent or less, wind speeds at locations in the Park (Locations 41, 42, 44) would increase about 20 percent, while wind speeds along the Marina would change by less than 5 percent (Locations 43, +3%; 68, -3%; 69, -5%). An exception would be at the south end

of the Marina (Location 47), where the already low wind speed would be reduced by 30 percent. Thus, although the ballpark would shelter the southern slips in the harbor, the net effect on the rest of the boat slips, and the harbor area beyond, would be imperceptible for northwest winds.

The west-northwest wind flows at a 22.5 angle west of Second Street. The harbor, and especially the harbor entrance, are not directly downwind of the ballpark. Directional wind data from the wind-tunnel tests indicate that west-northwest wind speeds at locations along King Street (Locations 46, 49) would increase 5 to 15 percent, wind speeds at locations in the Park (Locations 41, 42, 44) would be sheltered and would decrease by one to 33 percent, while wind speeds along the harbor would decrease by less than 4 percent (Locations 43, -2%; 68, -4%; 69, -2%). Again, an exception would be at the south end of the harbor (Location 47), where the existing wind speed would be reduced by 50 percent. Thus, although the ballpark would shelter the southern slips in the harbor, and the net effect on the rest of the boat slips, and the harbor area beyond, would be imperceptible for west-northwest winds.

For the west wind, the southern half of the harbor is directly downwind of the ballpark, Directional wind data from the wind-tunnel tests indicate that west wind speeds at locations along King Street (Locations 46, 49) would increase up to 11 percent, wind speeds at locations in the Park (Locations 41, 42, 44) would be sheltered and would decrease by 60 to 65 percent, while wind speeds along the north end of the Marina would increase by less than 3 percent (Locations 68, +3%; 69, -1%). The mid-section and south end of the Marina (Locations 43, 47) would be sheltered from west winds, and the existing wind speed there would be reduced substantially (Locations 43, -64%; 47, -39%). Thus, the ballpark would shelter the slips in the southern half of the harbor, and the net effect on the northern half of the slips, and the harbor area beyond, would be imperceptible for west winds. This reduction would diminish with downwind distance from the ballpark structure.

For the west-southwest wind, the entire harbor is directly downwind of the ballpark. Directional wind data from the wind-tunnel tests indicate that west-southwest wind speeds at locations along King Street (Locations 46, 49) would decrease (Locations 46, -38%; 49, -15%), wind speeds at locations in the Park (Locations 41, 42, 44) would be sheltered and would decrease by 21 to 64 percent, while wind speeds along the north end of the Marina would not change. The mid-section and south end of the Marina (Locations 43, 47) would be sheltered from west-southwest winds, and the existing west-southwest wind speed there would be reduced (Locations 43, -26%; 47, -35%). Thus, the ballpark would shelter the slips in the southern half of the harbor, and the net effect on the northern half of the Marina slips, and the Harbor area beyond, would be imperceptible for west-southwest winds. This reduction would diminish with downwind distance from the ballpark structure.

The existing rows of trees along the South Beach Harbor Walkway were not included in the wind tests, either for the existing condition, or for the project or project plus cumulative conditions. The tests conservatively reflect both existing and potential future conditions without the local wind-screening effects of mature trees. As discussed in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension, the SFRA is currently contemplating a number of options for that area, including surface parking, rather than open space. Development of that parking area would not affect wind conditions in South Beach Harbor. See Air Quality, Construction for discussion regarding impacts on South Beach Harbor.

Comment

The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... Wind impacts on boats moored out in the harbor are not adequately analyzed. Impact of wave action and surges from ferries on moored boats and breakwater was not analyzed. (Martin Fay, Rincon Point – South Beach CAC)

Response

Wind-generated wave action within the harbor would be expected to be greatest for those winds coming on-shore, namely for those winds that would place the harbor upwind of the

ballpark. For wind that would be influenced by the ballpark before it reaches the Harbor, there is a very small over-water fetch (distance) within which the wind could act to generate wave action. Any effect from the ballpark would more likely be due to the direct effect of wind on the boat hulls, superstructures, masts, rigging and sails. These wind effects would not be expected to be substantial, as discussed in Wind, South Beach Harbor.

Mitigation

Comment

Appendix B. Wind Page A.57, Page A.81...Wind-tunnel measurements demonstrated that wind speed reductions of 1 mph to 11 mph would occur at locations along the project's King and Third Street frontages and in the South Beach Park area if mature-sized landscape trees were present at spacings of approximately 40 ft., center-to-center. Those reductions would improve the general pedestrian wind environment along the project frontage sidewalks and in South Beach Park.

This needs to be explained in greater detail. Wouldn't this proposal interfere with pedestrian flow before and after games? How could the two needs be reconciled? [W]ill the depth of the soil above the underground parking garage be sufficient to allow mature trees to be planted? Again, by not studying the impacts of the proposed parking garage under the park, we cannot know if this very reasonable mitigation measure is possible. (San Francisco Tomorrow Waterfront Committee)

Response

A line of trees along a sidewalk would reduce the pedestrian capacity of that sidewalk, by reducing the effective width of the sidewalk by the two to three feet of width devoted to the tree planting well and trunk supports or guards.

Section IV.E, Transportation and Circulation, pp. IV.215 - IV.221 of the EIR, discusses pedestrian circulation effects and identifies the King Street sidewalk between Second and Third Streets as experiencing "congested" conditions during the first hour after a game. Those conditions take into account the effective sidewalk width, including street trees. Section V.B, Transportation and Circulation, pp. V.54 - V.59 of the EIR, describes

mitigation measures, including closing King Street between Second and Third Streets to traffic after games, to accommodate pedestrian flows.

As noted in Appendix A, p. A.81 of the EIR trees would serve to attenuate the force of the wind by breaking up wind flow with their canopy. At a 40-foot center-to-center spacing, people would be able to walk among the trees below the canopy. In landscaping situations, such as a bermed park over an underground parking garage, there would be tree wells integrated into the garage structure, along with a landscape planting drainage system, to accommodate the planting of landscape trees.

See discussion in Project Description, Redevelopment Agency Planning for Shared Access Drive, South Beach Harbor, and South Beach Park Extension, regarding potential plans for surface parking adjacent to the ballpark, that could replace the proposed extension of South Beach Park over subsurface bermed parking.

TRANSPORTATION AND CIRCULATION

Summary

Comments

Page I.19, line 9 - double negatives are used in the last sentence. The sentence should directly state "As described in V.B. Transportation Circulation, even with application of mitigation measures, there would still be significant transportation impacts."

Page I.21, Table I.B.1 is unclear and confusing and does not allow for direct comparisons. The table should be restructured into three columns, showing the three development scenarios a.b.c. across the top and a listing of roadway segments down the right side. The effect on the level of service can then be tracked and understood as a progression when read left to right across all three scenarios.

Page I.23, Table I.B.2, Same comment as above. (Rincon Point South Beach CAC)

Response

Although in fact correct, the phrase noted in the comments has been revised by amending line 9, p. I.19 in the EIR with the sentence:

> **As described in V.B. Transportation Circulation, even with the application of mitigation measures, these measures would not reduce the traffic impacts ~~to a~~ of the project below the level of ~~insignificance~~ significance.**

Table I.B.1, p. I.21, was intended to highlight three different comparisons of impacts on freeway segments. The first comparison, a comparison of freeway segments impacts for Existing Traffic and Existing-Plus-Project Traffic, isolates the direct impacts of the project. The second comparison, Existing-Plus-Project and Cumulative-Plus-Project, isolates the impacts associated with cumulative development. The third comparison isolates the difference in the impacts of the Cumulative-Plus-Project and the UCSF/Mission Bay Cumulative Scenario Plus Project. Reorganizing the table per the comment would not easily allow these direct comparisons of similar cases.

Table I.B.2, p. I.23 was designed to provide the same set of direct comparisons as Table I.B.1. For consistency it should remain in its current format.

Transportation Plans and Policies

Comments

Each one of the Eight Priority Policies has direct relevance to the Ballpark project, and must be addressed by the Giants, the city, or both. Actions or project components which we feel would contribute to a "Priority Policy Conforming Project" that is responsive to each of the Eight Priority Policies include:...

- **"That commuter traffic not impede MUNI transit service or overburden our streets or neighborhood parking**

Fans who drive are commuters to the Ballpark. Fan traffic and parking patterns, within the context of DEIR project definitions will significantly contribute to traffic congestion that impedes MUNI, and will overburden streets and usurp neighborhood parking. A "Priority Policy Conforming Project" will avoid or minimize these impacts by having a circulation plan that gives clear priority to MUNI, that encourages transit use, that minimizes conflicts among cars, transit, pedestrians and cyclists, that avoids undue concentrations of all modes of travel through neighborhoods, and protects neighborhood parking for local residents, neighborhood merchants and businesses and their patrons and visitors. The DEIR must analyze a plan and program that avoids fan traffic intrusion into residential areas and protects neighborhood parking resources. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

(III.104 Transport element of San Francisco's General Plan Obj. 1) This can in no way be achieved unless free travel is offered, or as in some European cities, the cost of public transportation is so low and so excellent that use of a private car is ridiculous. All of the objectives mentioned are well meaning solutions to a problem that will not go away until car users are forced to use public transportation because (a) the price of gasoline becomes so expensive that most people can't afford it and (b) tax money generated from gas sales tax goes to providing safe, regular, and superior public transportation to and from all points for the majority of the citizenry. (Mariuccia Iaconi)

All the foregoing considerations must be defined and incorporated within the context of a "Priority Policy Conforming Project" for the DEIR to be adequate, accurate and complete. On behalf of the Rincon Point - South Beach CAC we ask that you include in the DEIR an alternative that is "Conforming with Priority Policies." We believe that the project analyzed in the DEIR and the various alternatives are not supportive of the Priority Policies of Planning Code Section 101.1.

A project that is "Priority Policy Conforming" should contain the following components, planning principles, and mitigation measures, as follows:

Transportation is by far the most critical concern for both the community and the Giants. An effective Transportation Management Plan and Program should be based on the following Planning Principles:

- Transit First including dedicated lanes, signal pre-emption, economic incentives, preferential loading.
- Alternative Transit incentives for ferries, charter buses, van pools, car pools and taxis, including dedicated lanes and preferential parking for high occupancy vehicles.
- Gracious accommodations for pedestrians, cyclists and other non drivers.

Keep traffic and vehicles coming north of the Channel to the north, and traffic and vehicles coming south of the channel to the south. Avoid Channel crossings by vehicles to the greatest extent possible. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Response

Patrons who drive to a ballpark event are not commuters, as the nature of the trip is recreational rather than employment oriented, and recreational trips do not occur on a daily basis, unlike work-related tips. Thus, the Priority Policy quoted in the comments is not applicable to the project.

It is clear, however, from a planning standpoint, that the ballpark project needs to emphasize transit and minimize auto use on streets and in parking areas, particularly those in nearby residential neighborhoods. If the project is approved, mitigation measures adopted as conditions of approval would be included in a mitigation monitoring plan. Transportation measures in the mitigation monitoring plan should consider these planning principles as one underlying objective. The Ballpark Transportation Coordinating Committee described on p. V.4 of the EIR, if included in the mitigation measures adopted with the project, would have the responsibility of implementing many of the transportation mitigation measures and assuring that the planning goals are achieved.

While the cost of travel by transit or the automobile is an important factor in terms of the choice of travel mode to the ballpark, it is not clear that free transit travel is a necessity to

encourage transit use. The cost of the service may not be as important as the level of convenience and the directness of travel provided by transit. Care must be taken, however, to assure that the cost of transit is competitive with the cost of driving and parking at a ballpark event. This, too, would be an issue in the preparation of the final transportation mitigation program that is included in the conditions of approval for the project.

The General Plan *Transportation Element* Objective 1 is a very broad statement related to transportation needs of the City as a whole; Policy 1.3 under Objective 1 is the policy that is most relevant to the ballpark project. It is quoted on p. III.105, and states in part "Give priority to public transit and other alternatives to the private automobile as the means of meeting San Francisco's transportation needs...." The proposed ballpark project site was selected in part because of its transit accessability, and in proposing only 5,000 parking spaces (well under the estimated parking demand), would further encourage use of transit. A single private project sponsor would not influence the price of gasoline or the use of gasoline sales tax funds.

Setting

Comments

The street between Rhode Island and Vermont is Kansas. (Babette Drefke, Potrero Boosters & Merchants Association)

Page III.79, line 1 "Harrison Street serves a frontage-road function for westbound (not eastbound) I-80..."

Page III.98, line 20. Apparent typo. Off-street parking is about 30 percent occupied within the 5- and 15-? (0-5 and 10-15?) minute walk zones. Clarify. (Rincon Point South Beach CAC)

Section C of the initial study which addresses transportation and circulation issues neglects to include in Table X.C.2, titled "Study area street classifications," which is found on Pages A100 through 104, Terry Francois Boulevard, Illinois Street, Mission Rock Street and Mariposa Street. (Jeffrey Brown)

Response

The street naming in this area is confusing. The street located between Vermont Street and Rhode Island Street has two names. North of 16th Street it is named Henry Adams Street, as is shown on Figure III.E.2, p.III.61 in the EIR, for example. South of 16th Street it is named Kansas Street as noted in the comment.

On p. III.79 of the EIR, the first sentence has been corrected to indicate that Harrison Street serves as a frontage road to "westbound" I-80, not "eastbound" as is now stated.

> **Harrison Street serves a frontage-road function for ~~eastbound~~ <u>westbound</u> I-80, collecting and disturbing traffic between the freeway and local roadway network.**

On p. III.98, second paragraph, line 8 of the EIR now reads:

> **Off Street Parking is about <u>35</u> percent occupied in the 0-5 minute walk zone...**

Table X.C.2, Study Area Street Classifications does include Mariposa Street (p. A.101). This table was intended to identify those study area streets which have some special classification or designation in the *Transportation Element* of the City's General Plan.

Mariposa Street is designated as a Citywide Bicycle Route as shown in the table. Terry A. Francois Boulevard, Mission Rock Street and Illinois Street have no identified designations in the *Transportation Element*. They are classified as collector streets which are defined in the *Transportation Element* as "Relatively low-capacity streets serving local distribution functions primarily in large, low-density areas, connecting to major and secondary arterials."

Construction Transportation

Construction Traffic

Comments

p. IV.228 Construction Impacts: 1st paragraph indicates that the project will require "approximately 27 months to complete," however, this appears to disregard 4 - 5 months of demolition identified on p. 1 of the Project Construction Traffic and Parking Impacts chart. p. IV.231 1st paragraph, last sentence indicates traffic flows and transit operations will be affected by the proposed closures, however, there is no indication of the change in level of service. The document should indicate the nature and extent of the change in service level. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

Page IV.229, Truck Route #2: right on Sixth Street or do you really mean Fifth Street? (Rincon Point South Beach CAC)

How will the noxious effects of the construction site be dealt with? For example,...street disrepair, equipment mobilization, etc.

...Provide a construction liaison during construction to meet with us on a regular basis and maintain regular communications and agree to work in good faith to quickly resolve any problems that arise. Construction staging shall take place substantially on site, in the channel itself, or south of China Basin. Off-street parking shall be provided for construction workers. (Michael Karasik, Bayside Village Associates)

There are several grave concerns and questions with respect to construction impacts... Construction staging shall take place substantially on site, in the channel itself, or south of China Basin. Off-street parking shall be provided for construction workers. (Martin Fay, Rincon Point - South Beach CAC)

Response

The estimated 27-month project construction schedule is based on the periods of overlap possible between the four identified phases of construction activity. The four phases include demolition, foundation, super-structure and finish.

During the construction phase, as noted on p. IV.230 in the EIR, an estimated 570 workers would travel to the site at the peak level of construction activity. This activity plus construction vehicle activity represents an estimated total of 442 vehicles traveling to the site during the peak construction phase. This level of activity is very similar to the amount of traffic that would be associated with the non-game day (4:30 - 5:30 p.m.) traffic scenario, with the exception that most construction related trips occur during off-peak hours as most of the workers would work a 7:00 a.m. to 3:00 p.m. shift. As a result, construction-related traffic impacts would be less than the impacts of the ballpark on non-game days. Non-game days traffic impacts are summarized on pp. IV.161 - IV.164 of the EIR; the result of non-game day traffic would be a decline in level-of-service at one intersection: Harrison Street at The Embarcadero. All the other 65 study intersections would not experience a level of service change. Under construction conditions the impacts would be even less than these non-game day impacts. Construction activity would result in the closure of the curb parking lane on the south side of King Street in front of the ballpark. This lane, however, was never assumed to be available for traffic use in the EIR analysis. However, the activity in the parking lane next to traffic would be a minor impediment to traffic flow.

According to the project construction management consultant, Kajima International (see endnote 56 on p. V.236 of the EIR, all construction staging would take place on-site or from the waterside. The EIR has recommended that off-street parking for project construction workers be provided by the project applicant in lots located south of the site. This would likely occur in a portion of the lots to be leased for dedicated ballpark parking south of the Channel. If such parking were not provided, construction workers would have to find parking by parking on-street or in one of the nearby off-street private parking lots. This would likely result in some illegal parking in the limited on-street and off-street public parking around the site.

The following correction has been made to the EIR text on p. IV.229, in the second bulleted item:

> **Truck Route #2: To I-80 East from the job site, Third Street turn left on Brannan Street, right on ~~Sixth Street~~Fifth Street, right on I-80 East.**

The following new text has been added to p. IV.233 as an improvement measure:

> **The project sponsor would identify a neighborhood construction coordinator to assure that all of the construction mitigation and improvement measures would be implemented. The phone number of the coordinator would be posted at the construction site and made known throughout the adjacent community to assure prompt response to complaints**.

Construction Worker Travel

Comments

p. IV.228 Same paragraph, 2nd sentence suggests that overlapping phases of construction are the basis of schedule, but it is not discussed in conjunction with the phases indicated on Table IV.E.41. If phases really overlap, does that mean the number of workers on site is the total of the two phases which overlap?

p. IV.228 Same paragraph, 4th sentence states that Table IV.E.41 "summarizes the daily maximum number of construction workers and ... trips," however the table lists "average" number of workers and trips.

p. IV.229 1st paragraph, 2nd sentence: This paragraph claims overlapping construction phases will not create a condition where combined workforce or truck traffic exceeds "peak activity" of an individual phase. This is probably true, but since data provided in Table IV.E.41 is the "average" number of workers and trips, the quantities given are much less than "peak." With "average" quantities there may be substantially more trips due to overlapping the construction phases than this table suggests.

...p. IV.230 2nd paragraph refers to 570 workers per day as "an estimated maximum," however Table IV.E.41 states this is the "average." For many construction activities the "maximum" may be nearly double the "average." This text is misleading and may substantially understate the actual impact to the adjoining properties if the quantities shown in Table IV.E.41 are "averages." This may also mean that parking impact is also understated. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

Response

The maximum number of workers on-site is not expected to exceed 570 throughout the period of construction. This estimate takes into consideration periods of phase overlap. The estimate of the maximum number of on-site workers provided by the project construction management consultant is based on the management company's similar experience with other stadium projects. Recent projects managed by the Giants' construction consultant include the professional baseball parks in Denver, Colorado and Baltimore, Maryland.

Table IV.E.41, p. IV.229 has been corrected to show that the numbers of construction workers per phase represents a peak number estimate and is not an average.

TABLE IV.E.41
SUMMARY OF PROJECT CONSTRUCTION WORK TRIPS

Construction Phase	Demolition	Foundation	Super-Structure	Finish
Duration of Construction (months)	4.5	8	9	12
~~Average~~Peak Number of Workers On-Site per Day	61	195	490	570
~~Average~~Peak Number of Workers Vehicles per Day	43	140	360	420
~~Average~~Peak Number of Construction Vehicles On-Site per Day	14	25	25	22
~~Average~~Peak Number of Total Vehicles per Day	57	165	385	442
Average Duration of Work Shift	7:30 a.m. to 3:00 p.m.			

Source: Construction data received via 07/11/96 Kajima Corporation letter. Wilbur Smith Associates.

Construction Parking

Comments

Parking during Construction: During the 18-24 month (DEIR IV.261) or 27 month period (DEIR IV.230) of estimated construction, 500 additional cars will be parking in the area.

(DEIR IV.230). Only 20 of these cars will be provided with on-site spaces. In addition, 200 existing spaces will be lost which are presently on the site of the future ballpark. During this same period, the 825 parking spaces adjacent to the CBL Office Buildings will be lost to the development of the area by the Catellus Development Corporation. The cumulative impacts of these losses were not sufficiently analyzed by the DEIR. (David P. Cincotta, representing China Basin Landing, Ltd.)

Page IV.232, Construction worker parking: Have the Giants agreed to provide parking for construction workers south of the Channel? This should be a required mitigation measure. (Steven L. Vettel, Residential Properties Group)

Response

The EIR states that the temporary demand for parking by construction workers within a ten-minute walking distance of the project site cannot be met by the existing supply. This is a short-term impact of the project; parking demand is not considered to be a significant physical environmental impact (see EIR p. IV.214), and construction parking demand being a temporary effect, would also not be considered significant. The recommendation that sufficient off-street parking be provided in the area by the applicant is, therefore, included in the construction improvement measures discussed on p. IV.282.

The proposed Catellus Mission Bay development is currently just beginning the environmental review and planning process. The future elimination of public parking spaces as a result of Mission Bay North-of-Channel development and the scheduling of new projects in this area has not been determined. Therefore, it is not clear that there would be any substantial overlap of parking demand from the temporary construction activity at the ballpark, scheduled to be complete by spring of the year 2000, and elimination of parking due to the development of Catellus property.

Construction Improvement Measures

Comments

p. IV.228 Construction Impacts, 3rd paragraph: This paragraph suggests that truck operations during the demolition phased "would not typically be scheduled during peak

periods of background traffic." This would only be true when the contractor(s) is required to stop trucking operations during the hours of peak background traffic.

Recommendation A: Require the project [contractors] to limit trucks entering and exiting the site to the hours between 7:00 a.m. and 8:00 p.m. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

p. IV.229 2nd paragraph discusses truck routes as "typical," which does not place a requirement on the project to control the routes which the contractors may use. If the new I-280 ramps at 5th and King Streets are not completed prior to the start of the project, are alternative routes to be required? If so, these should be included as mandatory to the project.

Recommendation B: Require the project to require specific routes which do not impact local traffic, and keep all construction trucks out of residential neighborhoods east of Second Street. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

p. IV.232 1st paragraph, last sentence suggests a joint management "approach and traffic plan" to control circulation through the study area; however, no information on how this process would work and how the affected community would be able to provide input or approval of proposed mitigation measures.

Recommendation C: Require the project to monitor level of service at selected intersections and report to an independent EIR mitigation consultant any changes in level of service. This consultant would be selected and retained by the City and funded by the project.

The role and responsibilities of this consultant would include:

a) Maintain a "Hotline" to receive and log complaints from affected members of the adjoining community.
b) Forward complaints to designated project representative for their action and record commitments to take action.
c) Publish log of complaints and actions at monthly intervals.
d) Chair monthly meetings with representatives of the project, the surrounding community and affected City departments to discuss major problems which require a change in operations to remedy a situation which impacts the surrounding community and is not corrected by the project within a reasonable period.
e) Report to the City on compliance with mitigation measures in the Final Environmental Impact Report.
f) Coordinate with other projects under construction at the same time as this project and the City

Construction Improvement Measures, 1st paragraph suggests that the "majority of construction worker trips" will occur between 7:00 a.m. and 3:30 p.m. prior to morning and

evening peak periods of background traffic. This does not require start and finish times for the project which would assure that construction worker traffic does not add to the traffic congestion created by the reduced lane capacity and truck traffic.

Recommendation D: Require the project to set staggered start and finish times for contracts to assure that construction worker traffic does not contribute to rush hour peak traffic congestion within the study area.

Construction Improvement Measures, 2nd paragraph describes ways to "minimize conflicts between construction truck traffic and area traffic," however, the suggested mitigations should be stated as requirements instead of "the contractor could...." etc.

Recommendation E: Require the project provide a construction logistics supervisor who will be responsible for managing truck traffic in a manner which does not contribute to traffic congestion in the study area.

Require the project to provide truck entrance(s) and exit(s) configured so that trucks will not block multiple lanes when entering or exiting from the project site or off site marshaling/ holding areas.

Require the project to provide a marshaling/holding areas for trucks awaiting unloading so that these trucks do not wait in active traffic lane.

Construction Improvement Measures, 3rd and 4th paragraphs, discusses construction worker parking demand and suggests possible mitigation. The demand may be understated due to the [fact that the quantities given are much less than "peak." With "average" quantities there may be substantially more trips due to overlapping the construction phases]. Once an accurate demand is established the project should be required to provide for this parking and monitor actual vs. projected demand and supply.

Recommendation F: Require the project to manage construction worker parking to assure construction workers do not park in existing parking lots and on street parking which currently serve the existing community. The project's program for construction worker parking shall include:

a. Sufficient off street parking spaces to accommodate actual demand based on monthly manpower reports.
b. Incentives paid to workmen to encourage use of mass transit as a way to reduce demand and traffic impact.
c. Monthly report to the EIR mitigation consultant, which shows actual total demand and how the demand was satisfied (spaces, locations & number of rideshares, number using mass transit.) (John Moll, Assistant Vice President, O'Brien Kreitzberg)

Recommendation J: Require the project to utilize precast concrete structural components and precast concrete exterior wall panels to reduce the number of vehicles and workmen on site. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

Response

Construction truck activity to and from the site could be prohibited during peak periods of weekday background traffic by the City. The peak periods of background (commute) traffic in the vicinity of the project site typically occur between 7:00 a.m. and 9:00 a.m. in the morning and 4:00 p.m. to 6:00 p.m. in the afternoon/evening. According to the project construction consultant the majority of truck activity would be scheduled to avoid peak traffic periods. It is estimated that about 12 truck movements to or from the site might occur in the evening peak period during the foundation and super-structure phases of project construction. The prohibition of peak period construction truck activity could be implemented as a condition of project approval established by the City and enforced by the Department of Parking and Traffic; the EIR itself cannot "require" that measures such as this be included in the project, but can call out improvement measures such as those on pp. IV.232 - IV.233 of the EIR for decision-makers to consider.

The construction truck routes described as "typical" for project site access are based on a number of considerations including safe operations and maneuverability requirements, the size and weight of the vehicles and prohibitions controlling the use of some City arterials and secondary streets. The King Street I-280 ramps at Fifth Street are scheduled to be operational prior to the start of project construction. However, if the King Street ramps were not available at the start of project construction an alternate route to the site from the south would be used. Under these circumstances trucks with origins/destinations south of the site would use Third Street to and from the I-280 ramps at Mariposa Street and in the vicinity of Cesar Chavez Street. As a condition of project approval the City could specify truck routes that would minimize travel near or through residential areas, but as noted above, EIR cannot establish these requirements.

Daily start and finish times for the majority of project construction workers is scheduled to occur prior to the morning and afternoon peak periods of commuter traffic according to the project construction management consultant. This type of work schedule is common in the construction industry and is implemented at most large construction sites in the City. The off-peak scheduling of work times can be required by the City and implemented as a condition of project approval.

The follow text has been added to p. IV.232 of the EIR as a new third paragraph under Construction Improvement Measures, to address any points of conflict between construction activity related to the ballpark and construction activity related to the potential development of nearby Catellus property:

> **The Giants should coordinate ballpark construction activities with Catellus Development Corporation to assure that conflicts between ballpark and Mission Bay-related construction activities do not occur.**

A number of mitigation measures and requirements were suggested by commenters to be applied to construction traffic. Because construction traffic has not been shown in the EIR to be a potentially significant impact, mitigation measures are not required to be included in the EIR. Most of the suggested measures are elaborations on the constructions improvement measures already included in the EIR on pp. IV.232 - IV.233, and many of the suggestions are similar to those routinely employed by the San Francisco Department of Public Works on City construction projects.

One commentor recommends use of precast concrete to reduce the number of on-site construction workers and traffic. It is not clear that such a technique would reduce traffic, since the panels and other components would all need to be delivered to the site. Regardless, it does not appear that the structural design of the ballpark, which has been carefully planned in relation to seismic safety and sight-lines, among other things, could accommodate the use of precast components. The exterior has been designed to complement buildings in the nearby historic district. As construction-related traffic impacts have not been found to be

significant, a substantial change in the basic design and construction technique for the project is not warranted solely for the purpose of reducing temporary construction traffic.

Transit Impacts

Comments

p. IV.176 Last paragraph, Please identify what other areas of the city will have reduced MUNI service on game days. (Jeffrey Leibovitz)

Public Transportation: There is not sufficient staging area to accommodate the numbers of people who should be using public transportation, especially after games. MUNI cannot load fast enough or have enough cars available without taking away from other areas. (Janet Carpinelli)

Page IV.172, Shuttles: Both Bayside Village and South Beach Marina Apartments operate shuttle buses between those complexes and downtown San Francisco. There does not appear to have been any analysis of the impacts of the ballpark on this transit service (or on any other transit service, such as the MUNI 15, 30, 42 and 45 lines). (Steven L. Vettel, Residential Properties Group)

Page IV.195, Regional transit operators: The estimated number of patrons using regional transit operators is very low (for example, on a sold-out weekday night game, it is estimated that only 73 patrons will use BART from San Francisco and the Peninsula). Incentives and other means are needed to increase these numbers.

Pages IV.197-198, Golden Gate Transit, AC Transit: The bus bridge does not serve the Transbay Terminal, so cannot interface with Golden Gate Transit there. Has a shuttle from the ballpark to the Transbay Terminal (to serve GGT, AC Transit, Samtrans, Greyhound) been considered? (Steven L. Vettel, Residential Properties Group)

There is no money or discussion about mass transportation. That's our only saving point, is mass transportation. To get people to give up their cars is going to be very, very difficult. There has to be an incentive and ticket price might have something to do with that. (Nancy Anding)

This is...a site that has much greater transit, mass transit possibilities than Candlestick. This is dealt with in the report, and it is dealt with well...(Art Siegel)

Page IV.101. Table IV.E.7. Weeknight Post-Game ridership on MUNI Metro and on Buses may be significantly under estimated. This should be rechecked and reanalyzed. Same comment for Table IV.E.8, Page IV.102. (Rincon Point South Beach CAC)

Page V.43, Transit incentives: What means have been identified to improve the connection between AC Transit, GGT, Samtrans and the ballpark? Either the bus bridge should serve the Transbay Terminal or there should be a dedicated Transbay Terminal shuttle. The 15 and 42 lines are too infrequent and unreliable, particularly after weekday night games and on weekends. (Steven L. Vettel, Residential Properties Group)

Response

The availability of excellent mass transit access has been recognized from the outset by ballpark planners as critical to the success of a ballpark at a downtown location. The role of, and impacts on, existing local and regional mass transit providers have been investigated in detail in the report, and improvements and mitigations have been defined to enhance transit's role in serving the project. Approximately 50 pages are devoted exclusively to transit issues in the EIR.

Estimates of transit travel were based on a careful examination of travel behavior at 3Com Park, at downtown ballparks around the U.S. and on Citywide Travel Behavior Study (CTBS) guidelines. Assumptions and methodologies are discussed in detail in pp. IV.89 through IV.104. The estimates indicate that fewer people would take transit home from a night game than would arrive by transit for the game. One characteristic of transit travel to major events is that more people tend to ride transit to the event, than the number leaving the event via transit. This has been the experience of BART at the Oakland Coliseum. It is common for fans to arrange to meet someone at the game and ride home with them. This is particularly true for night games. Transit incentive programs are specifically addressed on p. V.43.

The discussion on p. IV.176 of the EIR mentioned the possibility of reduced service to some areas of the city if funding is not available for additional service to the ballpark. Since the issue of funding responsibility is currently under discussion, it is not certain that such an eventuality would come to pass. Reductions of service in order to serve the ballpark would be unlikely. If adequate resources were not available, ballpark service would most likely be reduced, rather than regular service.

Transit loading impacts are discussed for the MMX extension are discussed on p. IV.189 - IV.193. The MMX station at Second and King Streets would not have enough capacity to accommodate post-game MMX riders. As a result queuing into the street would occur. Queuing problems could also occur on the north side of King Street where the bus bridge would unload. In general as noted in the pedestrian impact discussion in Chapter IV of the EIR (pp. IV.217 - I.V.219), the sidewalks on the north and south sides of King Street and the crosswalks of King Street adjacent to the ballpark would not have sufficient capacity to accommodate post-game crowds. As a result pedestrians would likely spill into the street and conflict with traffic and transit vehicle movements in the area. Mitigation measures to resolve these issues are discussed in detail in Chapter V, on pp. V.48 - V.50. It is proposed to close King Street between Second and Third Streets during ballgames, which would allow use of the entire street and a 12-ft.-wide sidewalk for loading MUNI Metro and buses, respectively. Loading for the MMX cars would be from the street side for all but disabled persons, so platform sizes would not be a constraint. Up to eight standard, or five to six articulated buses could be stacked along the section of King Street with wide sidewalks.

Impacts on all MUNI lines in the vicinity were evaluated, both on a screenline basis and on an individual line basis in pp. IV.176 - IV.194. MUNI Lines 15, 30, 42 and 45 are part of the "South of Market" screenline in the project area as shown in Table IV.E.29, p. IV.180, for project impacts, Table IV.E.30, p. IV.182, for project plus cumulative impacts, and Table IV.E.31, p. IV.184, for the UCSF/Mission Bay cumulative scenario. Additional vehicle requirements for Lines 30 and 45 under both future cumulative development scenarios are defined on pp. IV.181 - IV.183.

It is true that the proposed bus bridge would not serve the existing or proposed Transbay Terminal sites directly, and the statements on pp. IV.197 - IV.198 have been corrected by replacing the last sentence on p. IV.197 with the following:

> **These fans could then reach the ballpark by transferring to MUNI Lines 15 or 42, or walking two blocks to the bus bridge stop on Second Street near Market Street.**

MUNI's Route 42 provides a direct connection between the ballpark site and the present Transbay Terminal site. Future route refinements for this diesel bus route would have it operate on Second Street to Townsend/King Streets. With the proposed relocation of the Transbay Terminal to a new site at Howard and Main Streets, the MMX station at Folsom Street would be only two short blocks (1,000 ft.) away from the Transbay Terminal. Thus, both the present and the planned future site of the Transbay Terminal would be conveniently connected by MUNI services to the Ballpark. Once the ballpark opens, if actual demands indicate a need, game day route variations for Golden Gate Transit, AC Transit, SamTrans, and Greyhound services could be operated.

The Bayside Village and South Beach Marina shuttles are not expected to carry ballpark patrons unless they happen to be residents of either apartment complex who happen to be going to a ballgame. The shuttles would be affected by general traffic congestion in the area. This would result in some delay for shuttle users. However, if the improvement measures identified in Chapter V of the EIR are implemented, Parking Control Officers (PCO's) stationed on congested routes would afford shuttle buses the same priority treatment as public transit. In addition, shuttle routes which use Third Street would benefit from the use of the transit priority lane discussed in Chapter V of the EIR, if it were established on ballgame days or on a permanent basis.

BART

Comments

While BART takes pride in its special events service, adequate facilities are necessary to ensure that efficient and safe transportation can be provided for the event attendees. Generally some of the assumptions in the analysis may underestimate the project impacts. The report provides no analysis of the internal circulation of the Embarcadero Station, currently the most congested in the BART system.

...Crush load estimate for BART cars: The discussion of impacts on BART (p. IV.195) assumes a crush load of 250 passengers per car. BART cars actually have a functional maximum capacity of about 150 passengers.

...Request for clarification of impacts on BART stations: The DEIR identifies the number of total entries to BART and the numbers of Muni patrons traveling via bus bridge and MMX. Yet the DEIR does not break out BART entries at the Embarcadero and Montgomery Street Stations. The volumes of ballpark fans entering each station should be identified to better assess the impacts of the project.

...In addition to noting the cost impacts on BART, the document seems to acknowledge that BART train capacity may be affected by the additional demand from ballpark patrons. The discussion on page IV.196 states that "the three transbay lines have sufficient excess capacity to accommodate the 1,800 fans projected to use BART to the East Bay following a weekday afternoon game assuming most BART travel occurred at around 4:00 pm or earlier" (italics added). Since the typical weekday game is expected to end at 3:30 and both the bus bridge and MMX take about 10 minutes to reach BART, it is certain that many of the patrons will be entering the BART station after 4:00 p.m.

No analysis of internal circulation at the downtown BART stations: While BART could have the train capacity to accommodate ballpark patron traffic, the impact of the patron traffic on the internal circulation at the Embarcadero Station would be significant. The project would significantly change the usage of the Embarcadero Station. Until this project, the joint BART/Muni stations in downtown San Francisco have operated more as common stations rather than intermodal transfer stations. Only a small percentage of the BART and Muni Metro patrons transfer between the two systems. Patrons wishing to transfer between the two systems must now climb up one level and down two (or vice versa). Large volumes of patrons wishing to simultaneously transfer between the two systems will create facility needs for which the station is not currently designed. Concentrations of ballpark patrons in BART stations may also create a need for additional station agents and other crowd control to ensure safety. The impacts on internal circulation at the BART stations should be discussed and mitigations should be identified. (Karita Zimmerman, Manager, Environmental Compliance, BART)

Response

BART patrons would be routed by the bus bridge primarily to the Montgomery Street Station rather than the Embarcadero Station. Some BART patrons undoubtedly would use the MMX line and transfer at the Embarcadero Station but most are expected to use the Montgomery Street Station. The most critical period would be the weekday afternoon postgame period when about 1,680 fans are forecast to enter the Montgomery Street BART Station during the hour after the game (3:30 - 4:30 p.m.). This would translate to about one passenger every two seconds. To distribute this demand, the use of both the New Montgomery and the Second Street station entrances at the Montgomery Street Station is proposed. The EIR has

been amended as follows to reflect this operations strategy by adding the following sentence at the end of the second paragraph on p. IV.186:

> **An alternative during times when buses are close together would be for the second bus to off-load at the Second Street loading area across from the Second Street entrance to the BART station. This would avoid sending too large a group of fans into one BART entrance.**

In practice, fans would arrive in pulses associated with bus arrival times. These pulses could amount to 80 passengers per minute. Delays during these pulses at entrances reaching the mezzanine would be less than morning commuters currently experience leaving the train platform.

The first paragraph under "BART" on p. IV.195 has been revised with the following:

> **Estimated peak hour ballpark patronage using BART to the East Bay ranges from 330 after a weekend day game to about 1,680 person-trips in the peak direction following a weekday afternoon game. ~~Assuming a "crush load" capacity of 250 per car, the incremental demand generated by the ballpark would be the equivalent of two to nine cars for any given pre-game or post-game period.~~ BART considers 150 passengers per car to be a 'practical maximum' (although crush loading following events may actually go higher). Based on BART's 'practical maximum' criterion, the additional demand for capacity in the peak direction of ballpark patron travel would range from the equivalent of 2.2 to 11.2 BART cars for any given pre-game or post-game period. During the period of maximum demand (post-weekday afternoon game) BART currently operates on five-minute headways, or 12 trains per hour in each direction. BART has the capacity and equipment to add more cars to existing trains and to add one or more trains during this time period.**

The following changes are made to the second sentence of the last paragraph on p. I.33 of the EIR to reflect the above revisions for p. IV.195:

> **Estimated peak hour ballpark use of BART would range from ~~325~~ 330 passengers after a weekend day game to 1,680 passengers in the peak direction following a weekday afternoon game, creating a need for 2 to ~~9~~ 12 additional BART cars.**

The discussion of BART impacts in the EIR states that BART transbay lines would have sufficient capacity to handle the additional demand under weekday post-game conditions assuming most BART travel occurred at "at around 4:00 p.m. or earlier" (p. IV.196). BART staff correctly noted that this implied fans would arrive at BART *by* 4:00 p.m. and pointed out that with an assumed game ending time at 3:30 p.m., and an estimated ten minute travel time to Market Street, many patrons would be entering BART stations after 4:00 p.m.

As documented in Table IV.E.32, p. IV.190, it is assumed that under post-game conditions fans would leave the ballpark within a one-half hour period and that most would be at the BART station by 4:10 p.m., still on the shoulder of the peak hour. Additionally, as discussed on p. IV.196, additional trains could be "slotted" into the schedule at Colma early and make round trips to the East Bay, still returning in time to fill the last scheduled p.m. peak "slot" assignments.

As noted above, the proposed strategy for BART access is to route fans to/from the Montgomery Street Station via the bus bridge. This is one reason the bus bridge concept was developed. Pedestrian flows at this station would be relatively direct and in conformance with the flows the station was designed to serve. While more agents might be required to serve the increase in patronage, the fares paid by several thousand fans per game would generate revenues to offset these potential new costs. Similar to the Oakland Coliseum events, fans could be encouraged to purchase round trip tickets for BART prior to the game in order to minimize ticketing problems after the game. The desirability to sell BART tickets at the ballpark might also be explored, particularly if the transit incentive program proposed as part of the transportation improvement measures in Chapter V includes some sort of special BART fare discount, or if the ballpark provides a kiosk for transit information and ticket sales.

MUNI

Comments

I attended a transit meeting the other day. To my dismay, I found out that San Francisco is facing a $1.3 billion shortfall in their transportation budget over the next 20 years. Muni is facing a $300 million shortfall...their shortfall, in their annual budget. I'll just leave it at that. (Jeffrey Leibovitz)

Page IV.186, Bus bridge: To maintain 15-minute cycles on the bus bridge, both Second and Third Streets would require exclusive transit lanes. How will this be accomplished on Second Street, while still allowing non-ballpark traffic to access residents and businesses in the South Beach/South Park area? (Steven L. Vettel, Residential Properties Group)

Page IV.189, Bus bridge: The assumption that arriving ballpark patrons will be evenly spread over the hour before games appears unduly optimistic. It is more likely that the half hour before a game will heavier usage that the period between one hour and one-half hour before. Will this require more buses during the half-hour before? Is there capacity for MUNI to provide?

Page IV.189, MMX: It should not merely be "assumed" that sources of funding will appear to operate the MMX at the recommended level. What are the alternatives for funding? Will the Giants assume funding responsibility?

Page IV.191, Bus bridge: After a weekday afternoon game, 23 buses would be required for the bus bridge between 3:30 and 4:30 p.m., a time period when MUNI does not have that capacity. What alternatives exist for providing for this capacity? Will the Giants subsidize this capacity? Alternatively, MUNI has stated that weekday afternoon games should start no later than 12:00 noon so that ballpark equipment could then be redeployed in time for the PM commute peak service (MUNI Memorandum from Philip H. Adams to Rudy Nothenberg, February 27, 1996, appendix I-12; WSA Memorandum from P.C. Martin to R. B. Henderson, May 13, 1996).

Page IV.193, MMX: If six 4-car trains are banked on King Street west of Fourth Street before the end of each game, can normal E line service between the CalTrain station and Embarcadero Station still operate during this period? (Steven L. Vettel, Residential Properties Group)

Page IV.80 - Figure IV.E.1 Planned Transportation Improvements, does not show the "F Line" connecting south with the MMX. (Rincon Point South Beach CAC)

Fig III.E.1 - Regional Transportation Setting - The 6th Street Station indicated on the figure will not be constructed initially—if at all. When the MMX begins operation late 1997 or early 1998, track will be available to store trains.

...Fig III.E.10, Existing Muni Transit - The figure should show the location of the new MMX platforms since they are constructed and service is pending operation.
p. III.94 Muni Metro Extension - The paragraph should note the location of each new MMX platform.

Fig IV.E.1, Planned Transportation Improvements - The figure should indicate the location of the new MMX platforms.

...p. IV.137, Fourth Street Corridor - The report notes significant deterioration in travel times on 4th Street which would affect Muni travel times. Both the 30-Stockton and 45-Union Stockton are important lines carrying passengers to/from Chinatown and other parts of the City. The report also suggests the installation (p. V.51) of a transit lane on Third Street and the use of Parking Control Officers (PCOs) to control traffic. These mitigation measures are acceptable to Muni... [O]n p. IV.194, the report suggests Metro Service would shuttle between the Ballpark and Embarcadero Station. As we have stated previously, we do not consider such a shuttle viable or desirable, and believe trains must operate west of Embarcadero. (Peter Straus, Manager of Service Planning, Muni)

Pages IV.180, 182, 184, Tables IV.E.29, IV.E.30 and IV.E.31: It is inaccurate for these tables not to take into account missed or late runs. MUNI knows the percentage of runs that are missed/late and that figure can be incorporated into the analysis. (Steven L. Vettel, Residential Properties Group)

Page I.31 - 33, There is no mention of impacts on E/F Line service impacts or needs.

...Page IV.85 Transit Improvements Completed 2000-2015. The direct F Line to MMX connection is not mentioned. Why?

...Page IV.178. In addition to Table IV.E.7 MUNI Fleet Deployment, a chart should be provided that shows "Passenger Capacity, By Vehicle Type, By Deployment, By Time of Day." This is easily calculated from the information already provided. Remaining available system carrying capacity, by vehicle type and time of day should also be shown.

Page IV.182 - Table IV.E.30. Since missed and late runs are a current, and likely continued reality for MUNI, this table should be expanded to reflect the impact on capacity for missed and late runs. At minimum, the footnote should reveal an average percentage hourly capacity reduction factor for missed and late runs. This same comment applies to Table IV.E.31, page IV.184. (Rincon Point South Beach CAC)

Third Street (p. III.82) - MUNI 81X service operates on Third Street only during the AM peak. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

MUNI transit vehicles on Second and Third Streets would experience delay during pre-game and post game conditions due to ballpark-related traffic. An exclusive transit lane is proposed only on Third Street. Under the preliminary traffic routing plan described on pp. V.6 - V.40 and the transit mitigation described on pp. V.48 - V.53, Parking Control Officers (PCOs) would be stationed along Second Street to facilitate operation of the bus bridge and regular MUNI service. The southbound operation of the bus bridge is not forecast to encounter congested traffic conditions and therefore the PCOs should be sufficient to maintain flow operation without the need for an exclusive bus lane. Thus, the proposed bus bridge would not by itself impact access to South Beach/South Park from Second Street.

The installation of the Third Street transit lane and the development of the PCO traffic management plan is expected to be closely coordinated with MUNI and monitored for effectiveness, if they are part of the transportation mitigation program adopted as a condition of project approval.

No information exists about the uniformity of fan arrivals the hour before a game. The period prior to a weekday afternoon or a weekday night game would not be in MUNI's critical equipment availability period. If arrival demands prove to be non-uniform, additional buses could be assigned to the ballpark service.

MUNI's preference is for a noon time start for weekday afternoon games. While this or even an earlier start would yield the least risk of equipment conflicts for MUNI, the 12:35 p.m. start time is considered to be most convenient for fans to attend games. In addition, as noted in the EIR on p. IV.77, Major League rules require that some games be played in the afternoons on "getaway" days, and these rules also establish the start-times in some cases. While the bus bridge uses six more buses than the present Ballpark Service, it positions the buses downtown for them to conveniently enter regular MUNI commuter peak service at 4:30 p.m. With fully loaded buses forecast, additional fare revenue would be generated for MUNI, perhaps sufficient

to cover MUNI's present Ballpark Service operating deficit but unlikely to fully cover expenses. The source of operating support for the ballpark service has yet to be quantified or assigned.

According to MUNI staff, "six [MMX] trains can be banked on King Street west of Fourth without significant interference with regular operations."[6] The EIR on p. IV.193, first paragraph already notes this, and the following text has been added after the second sentence:

> **MUNI staff also indicated that the Sixth Street Station may not be built, and that the track will initially be used to store vehicles.**

Figure III.E.10 on p. III.93 and Figure IV.E.1 on p. IV.80 in the EIR have been modified to show the location of the new MMX platforms, as requested by the MUNI staff.

The source of funding to operate MMX at the recommended level is still under discussion and cannot be identified at this time. This is one of several issues that decision-makers will need to address when considering action on the project. See responses under Mitigation for futher discussion.

The EIR suggested shuttling MMX trains between the Embarcadero and the Second and King Street Stations. Although this appears to be technically possible, MUNI, which would be running the service, does not consider it desirable. An alternate strategy, which would be acceptable to MUNI, would have trains continue in service west of The Embarcadero, if the required MMX capacity can be provided. Since a large portion of the shuttle patrons would be transferring at Market Street to other modes, interlining the ballpark trains would free up capacity on other MUNI Metro trains which could then be rededicated to MMX service. With proper scheduling, the amount of net new service required to serve ballpark patrons would amount to the same for such an "interline" scenario as for a "shuttle" scenario. The following paragraph has been added to p. IV.191 of the EIR after the second paragraph:

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6. Memorandum from Philip H. Adams to Rudy Nothenberg, February 27, 1996, re: Giants Ballpark Summary of Implications for MUNI.

While the above analysis assumed that the ballpark would be operated as a shuttle between the Embarcadero and Second Street Stations, all or some of the MMX ballpark trains could continue in service west of the Embarcadero Station. Since a large portion of the shuttle patrons would be transferring at Market Street to other modes, interlining the ballpark trains would free up capacity on other MUNI Metro trains which could then be rededicated to MMX service. With proper scheduling, the amount of net new service required to serve ballpark patrons would amount to the same for such an "interline" scenario as for a "shuttle" scenario.

A direct connection of the F line to the MMX would be highly desirable for ballpark service; however, the feasibility of such a connection has been under study by MUNI, but it is not yet definitely programmed by MUNI and therefore is not assumed in the analysis.

Figure IV.E.7 (p. IV.178) provides a general illustration of fleet deployment by time of day, to indicate that at certain times of day vehicles are available for deployment for ballpark purposes if needed. MUNI's existing fleet is fully deployed during the critical period following weekday day games, which is the focus of analyses in this EIR section. During this time period, the critical concern is for available capacity on buses already in service on lines serving the downtown area. This analysis is summarized in Table IV.E.29 (p. IV.180), which presents comparisons of passenger volumes with capacity during the critical weekday post-game period, aggregated by screenline in accordance with City guidelines. The interested reader can find the tabular equivalent of Figure IV.E.7 in Table 4-7 of the *Background Transportation Report*, following page 4-8.

Analyses of MUNI transit volumes versus capacities in this EIR were based on the assumption that all scheduled service is provided. According to the Transport Workers' Union,[7] for fiscal year 1995-96, 4.19 percent of morning and afternoon rush hour pull-outs did not occur due to lack of an operator or equipment. Footnotes on Tables IV.E.29 (p. IV.180), IV.E.30 (p. IV.182), and IV.E.31 (p. IV.184) already noted that the screenline

7. Response to "Condition Assessment Report of the Public Transportation Department", Transport Workers Union of America, March 20, 1996.

analysis may not include the effect of missed or late runs. These footnotes have been modified as follows:

> **1. Capacity based on published MUNI timetables, Fall 1996, and may not include the ~~effect~~ impact of missed or late runs, as a typical day's actual capacity would be 4 to 5 percent lower than scheduled capacity under current conditions.**

MUNI is currently attempting to alleviate the problem of missed runs, but must work within the context of budget shortfalls and equipment maintenance problems, among other difficulties. It is difficult to predict at this time how far MUNI will get toward its goal of filling all runs by the future ballpark opening year.

As requested in the comments, the following correction has been made in the last sentence, first paragraph, p. III.82:

> **MUNI bus lines 15, 30, 45, 76, and 81 (a.m. peak only) operate on Third Street.**

AC Transit

Comment

p. III.72, AC Transit - Muni no longer contracts with AC Transit to provide bus service between Treasure Island and Transbay Terminal. Muni now operates the service itself as the 108-Treasure Island. (Peter Straus, Manager of Service Planning, Muni)

Response

The text on p. III.72 of the EIR has been modified as follows to indicate that service between Treasure Island and San Francisco is now operated by MUNI as the 108-Treasure Island line. This following sentence has replaced the last sentence under the "AC Transit" discussion:

> **Route T is now operated by MUNI as the 108-Treasure Island line.**

Golden Gate Transit

Comments

Effective March 2, 1997, Golden Gate Transit Civic Center bus service was relocated from Folsom Street, Howard Street, and Transbay Transit Terminal to Mission Street. DEIR's graphic (page III.70) and text should be revised to reflect this change.

DEIR states (p.V.197) "GGT (existing setting plus project impacts) are projected to be minor, with at most 75 patrons arriving to the game on weekday afternoon (and evenings), or 4 patrons for each of the 20 routes serving the Financial District."

This statement is based on average conditions during GGT's weekday afternoon peak-period service from San Francisco. More specific estimates (based on forecasts shown on page IV.195 and current GGT schedules) follow:

Weekday Afternoon Games

Seventy-six additional GGT patrons arriving San Francisco between 11:15 a.m. and 12:15 p.m. would be loaded on seven Basic Service routes (not 20 routes as reported in the DEIR), on 10 (one-way) trips or the equivalent of 7.6 additional patrons per bus.

Eighty-two additional GGT patrons departing San Francisco between 4:45 p.m. and 5:45 p.m. would utilize 102 basic and commute service trips, or the equivalent of less than one additional patron per bus.

Weekday Night Games

Nine additional GGT patrons arriving San Francisco between 6:15 p.m. and 7:15 p.m. would arrive on nine basic service trips, or about one additional patron per bus.

Fourteen additional GGT patrons departing San Francisco between 11:45 p.m. and 12:45 a.m. would be loaded on two basic service trips, or 7 additional patrons per bus.

The projected increase in patronage arriving San Francisco during weekday afternoon games is significant based on current average midday loading of 14 patrons per bus. Similarly, an increase in patronage departing San Francisco following weekday night games is significant for GGT operations based on average late night loading of approximately 13 patrons per bus. However, based on capacities of 39 to 45 patrons per bus, these additional patrons could be accommodated.

District acknowledges that GGT patrons would need to transfer to proposed "bus bridge" service to reach the facility. (Jerome M. Kuykendall, Director of Planning and Policy Analysis, Golden Gate Transit)

Fig. III.E.4, GGT: Golden Gate Transit is shifting operations from Howard/Folsom to Mission Street. This figure should indicate that. (Steven L. Vettel, Residential Properties Group)

Response

The paragraph under the heading "Golden Gate Transit" on p. IV.197 has been replaced with the following:

> **Impacts of the project on Golden Gate Transit are projected to range from nine patrons arriving on GGT for a weekday night game to 82 persons departing after a weekday day game. The greatest impacts on available capacity would be 76 patrons arriving for weekday afternoon games at a time when they would be loaded on ten one-way bus trips, or 7.6 patrons per trip, and 14 passengers departing a weekday night game, who would be loaded onto two bus trips, or 7 passengers per bus. These runs currently average 14 and 13 patrons per bus, and with the added trips would still be within the capacities of 39 to 45 passengers per bus. The 82 persons departing after a weekday game would be loaded onto 102 basic and commute trips, or less than one person per bus.**

Figure III.E.4 on p. III.E.70 has been revised to depict that Golden Gate Transit service which formerly ran along Howard and Folsom Streets now operates along Mission Street. The first phrase in the fourth sentence in the first full paragraph on p. III.73, has been revised as follows to indicate that the proposed shift from Howard and Folsom to Mission Street has recently been implemented.

> **Golden Gate Transit has ~~proposed~~ recently implemented its plan to relocate its bus routes from Howard and Folsom Streets to Mission Street, ...**

Ferries

Comments

Reference to ferry service operated by the Golden Gate Bridge, Highway and Transportation District should be referred to as "Golden Gate Ferry" not Golden Gate Transit. (Jerome M. Kuykendall, Director of Planning and Policy Analysis, Golden Gate Transit)

Please note that existing ferry services operated by "Red &White Fleet" and Blue & Gold Fleet" (p. III.73) will operate jointly under the name "Blue & Gold Fleet" in May 1997.

The last weekend departure to Sausalito from San Francisco is 8:05 p.m. only from May through September. Other times of the year the last weekend departure to Sausalito from San Francisco is 6:55 p.m.

Please note that currently Red & White ferry service to Tiburon from San Francisco is at either Pier 1/2 (San Francisco Ferry Building) or Pier 43 1/2(Fisherman's Wharf), not Pier 39 as indicated on page III.74. (Jerome M. Kuykendall, Director of Planning and Policy Analysis, Golden Gate Transit)

Response

References to ferry service operated by the Golden Gate Bridge, Highway and Transportation District have been modified to identify the service as "Golden Gate Ferry" service on p. III.73 of the EIR.

References to "Red & White Fleet" and "Blue and Gold Fleet" on pp. III.73 and III.74 have been modified to reflect that these two formerly separately owned services now operate under the single name "Blue & Gold Fleet."

Description of the ferry service to Sausalito on p. III.73 have been clarified to reflect seasonal changes in schedules as follows. The last sentence in the second paragraph under "Ferry Services" has been replaced with the following:

> **The last weekday departure to Sausalito from San Francisco is 8:00 p.m. and the last weekend departure is 8:05 p.m. from May to September and 6:55 p.m. the rest of the year.**

The EIR text on p. III.74 has been modified to properly identify the San Francisco termini of the Red & White (now Blue & Gold) ferry service to Tiburon as follows. The first sentence in the second full paragraph has been replaced with the following:

> **The Blue & Gold Fleet currently provides service from Tiburon via both Pier 1/2 (Ferry Building) or Pier 43 1/2 (Fishermans Wharf).**

CalTrain

Comments

Page IV.87 The location of the proposed new station would shift approximately one block further west from the project site and one-half block north from the existing station.

We would suggest the placement of an events platform at the current station site, to reduce the distance to the ballpark and encourage greater use of CalTrain by Peninsula fans. (San Francisco Tomorrow Waterfront Committee)

Page IV.87: The Draft EIR inadequately discusses the impacts of the proposed CalTrain downtown extension. Would a station 4 blocks, rather than 2 blocks, from the ballpark decrease the number of patrons using CalTrain? Would the inability to stage more than one train at an intermediate station, thus increasing the amount of time some patrons would wait for a train after games, decrease the number of patrons using CalTrain? (Steven L. Vettel, Residential Properties Group)

CalTrain (p. III.69) - Peak period trains have four to five (not 10) 140 seat cars and can hold bicycles and wheelchairs.

...MUNI METRO Extension (p. IV.189) - As stated in second paragraph, ballpark demand alone would clearly overwhelm MMX under certain operating scenarios. This is a major concern to CalTrain, which will rely heavily on fast, convenient and reliable MMX service to get commuters to/from trains.

It should be noted that CalTrain ridership has registered annual increases of at least 5% in recent years. In fact, daily ridership is up 7.4% through March for the current year. If this trend continues, it will affect seat capacity during weekday peaks. The reverse commute market for San Francisco residents to Peninsula jobs is a growing market for CalTrain. These riders would compete with Ballpark patrons for seats on the MMX.

CalTrain (p. IV.196, revise last paragraph) - The maximum train length is ten (not nine) cars, with typical trains having 4-5 cars. We would like to clarify the first paragraph (p. IV.197) that, Table IV.E.35 indicates that three to five additional cars would need to be added to the early rush-hour trains; these cars are or will be available after currently ordered vehicles are delivered. It should be noted that car availability depends on ridership increase rates, service expansion strategies and equipment cycles. Also, I must call to your attention that footnotes 37 and 38 on p. IV.235 incorrectly references JPB Resolution No.1996-39. We believe the reference is to a January 9, 1997 letter.

In addition, recent ridership increases may decrease available capacity as stated above. CalTrain offers more than 6,700 parking spaces. This includes the system-wide capacity of 6,300 parking spaces at stations north of Tamien. Most stations and adjacent city lots are at

80 - 100% capacity on a daily basis. CalTrain has identified a latent demand of 1,000 who would use CalTrain if parking was available. The CalTrain Market Demand Study (1996) identified a 1,500 parking deficit in 2010, if not met in the short term. JPB and its partners are exploring efforts to expand parking at stations. Parking at CalTrain stations for the 13 weekday games is a concern. Patrons may have to park in the neighborhoods, walk, drop off or seek other alternatives to suburban stations. Cumulative Regional Transit (p. IV.198) - CalTrain draws attention and clarification to cumulative growth by year 2015 which equates to two cars for CalTrain and two BART cars. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

Although the EIR discusses the possible eventual extension of CalTrain to downtown, it was not assumed in any of the analyses. The future of such a plan is uncertain as discussed above in Transportation and Circulation, Analysis Assumptions, *Transit Assumptions*, and it is unclear whether implementation of a CalTrain Extension would occur within the planning horizon of the report. All analyses assumed that the CalTrain Station would remain on its present site as a terminal facility. If the extension were to occur the primary impact, as noted on p. IV.87 of the EIR, would be to shift the station one block further to the west away from the ballpark, but still within reasonable walking distance. This new station at Fifth Street would have three tracks, which would allow for staging ballpark special trains.

On p. III.69, under "CalTrain," the fifth line has been revised to read:

> **...and peak period trains have ~~five to ten~~ four to five 140-seat cars.**

The following statement has been added on p. IV.197 of the EIR at the end of the discussion on CalTrain:

> **CalTrain ridership has registered annual increases of at least five percent in recent years, and has increased 7.4 percent in the first three months of 1997. Much of this growth has been in the reverse commute, San Francisco to Peninsula market. Continued ridership growth may conflict with CalTrain's ability to provide capacity for ballpark fans. This would be particularly true for weekday afternoon games. During the weekday afternoon time period the availability of parking at Peninsula stations for ballpark fans would also be very limited.**

On p. IV.196 of the EIR, in the last line, the maximum train length has been corrected to read "ten cars" rather than nine, as now indicated. The references to the JPB Resolution 1996-39 were as intended, and were not intended to refer to a January letter.

The need indicated on p. IV.198 for two additional CalTrain cars, two BART cars, and two Golden Gate Transit cars represents the number of peak transit vehicle trips which would need to be added during the afternoon post-game study period (3:30 - 4:30 p.m.) to accommodate the demand added by cumulative growth expected to occur by the year 2015. This is growth in addition to the transit demand generated by the ballpark during this period. It is not clear whether these transit vehicles are part of the current fleet or if they would have to purchased to meet this demand.

SamTrans

Comment

SamTrans (p. III.71) - Routes 1F, 47F and 49F operate on 6th Street to I-280. Midday service is provided by two lines (7F, 7B) operating on 30-minute headways. Route 1F, 47F, and 49F does not operate on weekends. Route 1F serves Pacifica via I-280. Routes 48F and 49F serve San Mateo and Foster City via I-280 and I-101.

I must mention that it is very likely that the service mix may change by the time China Basin is open. The District is undertaking a System-wide Bus Evaluation Study. Preliminary results will not be available until early summer 1997. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

On p. III.71 in the EIR under the topic "SamTrans" the following paragraph replaces the EIR text to provide more detail about the specific routes operating near the project site, rather than simply noting the number of SamTrans bus lines:

> **SamTrans operates the trunk of its basic San Francisco service along Mission Street from Ninth Street to Spear Street. Routes 1F, 47F, and 49F operate on 6th Street to I-280. Midday service is provided by tow lines(7F,7B) operating on 30 minute headways. Routes 1F, 47F, and 49F do not operate on weekends. Route 1F serves Pacifica via I-280. Routes 48F and 49F serve San Mateo and**

Foster City via I-280 and U.S. 101. The stop nearest to the ballpark is at the Transbay Terminal on Mission Street, about one mile from the project site or a 20 minute walk. It is likely that the service mix may change by the time the ballpark opens, as Samtrans is undertaking a System-wide Bus Evaluation Study.

Traffic Impacts

General/Traffic Study Areas

Comments

p. IV.85, Transit improvements 2000 - 2015 - As noted, Third Street Light Rail is estimated to begin construction in 2000 and operation in 2003. The report should review construction impacts on stadium detours and operation. (Peter Straus, Manager of Service Planning, Muni)

We are a property owner at 665 Third Street, San Francisco and have the following concerns regarding the Traffic Management for the proposed Giants Stadium.

Circulation - It appears access to our building will be limited during game days. This has a potential negative impact on the business housed in our facility. (H. James Schafer)

Traffic: The DEIR points out that vehicles (mostly cars) will cause unacceptable traffic congestion in a two mile radius surrounding the park before and after games. This will certainly aggravate the existing commuter traffic problems. (Janet Carpinelli)

There is no existing traffic taken into account. (Nancy Anding)

For sake of argument, it is assumed that a 5,000-car parking area will be available through a three-sided deal negotiated between the City's Port, Catellus Development Corp. and the Giants and that this, plus another 34% of available street parking would reduce the parking deficit during a worst case week-day scenario to only 2,430 spaces (i.e., 16% of home games). By chance, has anybody calculated the line length of 2,430 autos, endlessly circling the area looking for non-existent parking? Try 9+ miles! Now imagine the effect on other arriving fans, existing street traffic, or anyone trying to make a living in the area. (Silva B. Creg)

The completeness of the transportation and circulation element of the EIR is also in question. Certain specifics remain unanswered regarding post-game flow on Third Street, north of Harrison Street. At Third and Harrison, 41% of the stadium traffic is split with 12% going both east and west, leaving 17% to proceed north. Where does it go? How will it impact Market and Mission Streets and the non-game traffic that uses these streets?

Why is the Brannan St. on-ramp to S-280 practically unused (2%) while the Mariposa Street on-ramp to S-280 becomes saturated. If the N-280 off-ramp remains open, it will impede exiting game traffic on Mariposa or else backup onto N-280. If the N-280 off-ramp is closed to avoid a hazardous backup, north bound 280 traffic will be deposited at the Brannan St. off-ramp into the very heart of the mess.

Lastly, what happened to the 30% of traffic heading east across the Bay Bridge? I can only account for about 20%. (Silva B. Creg)

The Ballpark will paralyze the city on event days (could be several days a week). History shows us that Giants fans will not take public transportation, especially when the giants are building limited parking lots. All of the freeways feeding into the heart of San Francisco will be frozen with traffic on event days, like traffic jams caused by closure of the Bay Bridge...The Giants say that the Ballpark will bring more money to the City. This is not true, it will bring more money to the Giant Owners, but not to other City businesses. Will you go to restaurant or attend a business appointment, if you cannot find parking within many block or a mile away? (Jerry A. Peterson)

(b) There is a question of the accuracy of data presented in the DEIR (IV 16.8); the information model is outdated 1.2. 16th Street and Potrero have been transformed traffic-wise since the completion of the mall at Potrero/16th/Bryant. Parking on the street is next to impossible now, parking near the post office is strained and difficult for those who want to merely go to the post office. The closing of Central Freeway has also impacted this area.

(c) A true traffic count is needed. (Mariuccia Iaconi)

p. III.62 The traffic study area should be expanded to include Montgomery St. north of Market St. because of potential conflicts during peak p.m. demands. (Jeffrey Leibovitz)

p. III.120 Are we asked to believe that during a single sampling over a ten minute period Townsend St. carries a large amount of traffic most of the time. See foot note 12. (Jeffrey Leibovitz)

IV.135, Arterial Impacts: 16th street needs to be added to the [arterial] analysis. (Diane Nygaard)

An evaluation of the EIR proposal for the China Basin Ballpark in the San Francisco area has revealed that the new ballpark would cause a significant impact on the already congested conditions of the area's transportation system and adversely affect the operations of the San Francisco Area CHP.

Many of the games that will be played at this new stadium are proposed as day or afternoon games. If games start times are anywhere from 11:00 a.m. to 2:00 p.m., this would mean that the ingress and egress of ball game traffic would inundate the already congested on/off ramps, highways around the downtown area and approaches to the Bay Bridge. Commute congestion on the freeways in the immediate area of the new proposed ball park, starts anywhere from 6:00 a.m. into the City and 12:30 p.m. going out of the City. The evening commute does not subside until well after 7:00 p.m. on most weekdays, well after 8:00 p.m. on Fridays and beyond that on major holiday weekends. (Captain R. J. Hall, Commander, Department of California Highway Patrol, Golden Gate Division)

The San Francisco Area [CHP] also believes that weekend ball games would cause just as much of a problem for the Area as the weekday games. Because baseball is a spring and summer season activity, the weekend games would cause ball park patrons to compete for the available parking spaces in the downtown area with the thousands of tourists that make San Francisco their vacation destination. This delay in finding available parking would cause an accordion effect with traffic getting off the freeway and then congest the freeways after [weekend] games with patrons going east across the Bay Bridge and south on U.S. 101. (Captain R. J. Hall, Commander, Department of California Highway Patrol, Golden Gate Division)

[T]raffic. I feel that the San Francisco Giants have worked very hard in creating transportation available to the fans and to the people of the neighborhood. They will be coming to the new park by bus, ferry, taxis, Caltrans trains, shuttle buses. So I feel that the traffic jam coming and going to the park won't be that bad. (Teresa Archuleta)

Response

The Third Street Light Rail Project is currently planned to be under construction in the year 2002 - 2003, and the ballpark would open in the year 2000. Impacts of ballpark traffic on Third Street are discussed in the EIR on pp. IV.136 - IV.137 (the Third Street corridor, where weekday afternoon post-game traffic would cause LOS F conditions) and pp. IV.146 - IV.156 (Third Street intersections, where weekday afternoon post-game traffic would cause LOS E or F conditions at most intersections and weekend day post-game traffic would cause LOS F conditions at some intersections). The preliminary traffic routing plan described in Chapter V of the EIR suggests that non-ballpark traffic be re-routed to other streets so that Third Street could be used mostly by ballpark traffic destined for the dedicated parking areas. This would reduce the traffic volume on Third Street. Ballpark traffic would also be using Terry A. Francois Boulevard, or possibly Illinois Street, as an alternate route to Third Street in the case where there is severe congestion on Third Street (which would most likely happen on the segment north of Mariposa Street). On-duty PCO's would also help assign traffic. When finalizing the traffic routing plan, the project sponsor and the City should coordinate with MUNI so that ballpark traffic would minimize impact on the Light Rail construction and vice versa to the extent possible.

Traffic on Third Street would inevitably increase on game days before and after games. Traffic impacts on Third Street, which is one-way northbound north of Berry Street, would

be limited under *pre-game* conditions since ballpark traffic would mostly be destined southbound on Fourth Street (see Table IV.E.25, p. IV.146, where, for example, the Townsend and Third Streets intersection is shown at LOS D before a weekday night game, but LOS F after a weekday afternoon game). In other words, traffic destined for the businesses on Third Street would still be able to get to their destinations before ballgames or events with minimal changes to their routes.

Potentially, traffic impacts under *post-game* conditions could be worse, given that northbound ballpark traffic would be traveling on Third Street. Traffic impacts on businesses along Third Street might be more noticeable following a weekday afternoon game (3:30 - 4:30 p.m.). The address at 665 Third Street does not have an off-street parking lot, so there is no direct access from Third Street; therefore, ballpark traffic would not block a driveway. However, as noted in the EIR, this segment of Third Street would operate at LOS F after weekday afternoon games (see Table IV.E.24) and the nearby intersections would also operate at LOS F after weekend day games. Pedestrians might clog streets from King Street south to the South-of-Channel dedicated parking areas, further disrupting traffic attempting to reach buildings on Third Street from the south. Non-ballpark traffic destined for the above address would continue to be able to do so by following the recommended detour routes for non-ballpark traffic if a traffic routing plan is implemented similar to that described in Chapter V of the EIR. Existing, metered on-street parking would be available on the west side of Third Street under the preliminary traffic routing plan.

On weekends, background traffic is relatively light during the post-game hour; however, LOS at many intersections along Third Street would be E or F during the hour after ballgames or events. The overall traffic condition with detour and signal timing adjustments similar to those described in the mitigation section of the EIR (pp. V.4 - V.43, and Table V.B.3, which shows LOS at Third Street intersections of D or better at most locations) would continue to be acceptable and users would continue to be able to access the above-mentioned businesses with relatively little delay.

The transportation analysis was prepared assuming little in the way of improvements or mitigation, as is appropriate for an EIR. It is, therefore, quite conservative, however, it does not support a statement that there would be unacceptable traffic congestion for a two-mile radius, as suggested in one comment. The extent to which congestion would occur is documented in the EIR on pp. IV.115 - IV.175.

The "worst case" traffic congestion that would be caused by ballpark traffic would be more likely to occur if a weekday ballgame were to run over three and a-half hours (which occurs about 12% of the time, as depicted in Figure 3-1 in the *San Francisco Giants Ballpark at China Basin Background Transportation Report*) and post-game traffic were to mix with the afternoon commute traffic. That is not expected to occur often (an average of two or fewer times per year). A typical weekday afternoon game would likely end at around 3:30 p.m. and ballpark traffic would be let out before the 4:30 - 5:30 p.m. commute peak hour. The Giants have agreed that no event would be scheduled to end during the peak traffic period.

Impacts of ballpark traffic on major freeways are inevitable and occur today on ballgame days at 3Com Park, but would be minimized with proper mitigation and improvement measures and a Transportation System Management (TSM) Plan.

It is inappropriate to compare traffic impacts of the ballpark and closure of the Bay Bridge. While ballpark traffic is expected to cause some delay at the freeway ramps, traffic would slowly get on the freeway. However, if the Bay Bridge were closed, traffic would not be moving at all.

All project traffic impacts were analyzed with existing traffic taken into account. Existing traffic counts at all study intersections (except those under construction such as the ones on King and Berry Streets, which were based on 1995 data) were taken during the study time periods on typical weekdays and weekends (when there was not a baseball game at 3Com Park) between March and May of 1996. These counts were conducted by Wilbur Smith Associates and Marks Traffic Data Service. For existing traffic conditions, please refer to

Figures III.E.5 to III.E.9 in the EIR (pp. III.87 - III.91). It is impractical to keep updating traffic data throughout the entire EIR process, and to do so would not substantially improve the analysis information, as major new changes have not occurred in the circulation system since the counts were conducted. Further, it is important to note that Central Freeway would have very little impact on the traffic pattern near the intersection of Potrero Avenue and 16th Street, as suggested by the comment. Regardless of the origin and destination, traffic accessing that intersection (and the new shopping center) would not likely use any of the Central Freeway ramps, as closer freeway access is available to I-280 and U.S. 101, and the Central Freeway provided only about one mile of freeway between the nearest north-bound entrance ramp and the final exit when it was open prior to demolition during the summer of 1996.

The EIR did analyze the "worst case" scenario, meaning a "sellout" game, which was estimated to happen during approximately 37 percent of all games; this "worst case" situation would create a deficit of about 2,580 parking spaces, not 2,430 as reported in one comment. It is probable that some drivers would circle the area looking for "non-existent" parking on a consistent basis, although they would not, of course, form a single line, but would use all the streets in the nearby grid, primarily in the South of Market area closer to Market Street where there are many garages and parking lots. Actually, past research suggests that people change their travel behavior in order to find other ways to get around more easily; equilibrium would be achieved at some point. In this particular case, if ballpark fans realize that driving to a game is difficult (based on their knowledge and experience of traffic conditions in the area during certain time periods), they would likely use other modes to arrive at the ballpark for other games or events. It is important to note that ballgame fans who drive are generally aware of the congested traffic conditions and parking problems in the area, especially near commute hours and would also learn the best routes to the areas where parking is available. Under the suggested transportation mitigation measures (Chapter V of the EIR) there would be changeable message signs on the major freeway approaches to inform drivers about traffic conditions on local streets so they can alter their routes accordingly. Those who continue to drive to weekday afternoon ballgames would arrive

prior to the main commute period and those arriving for a weekday evening game would arrive after the main commute, so drivers searching for parking would not add to p.m. peak period traffic.

Post-game ballpark traffic would travel along Third Street and would eventually turn on to other streets such as Harrison, Howard, or Folsom, depending on their destinations. There would be a portion of ballpark traffic that would continue to travel northbound on Third Street past Market Street. The impact of ballpark traffic on Third Street near Market and Mission Streets can be found in the arterial and intersection level of service analysis sections (pp. IV.135 - IV.172) of the EIR. For example, Tables IV.E.25 (pp. IV.146 - IV.149) and Figures IV.E.2, p. IV.151, show that the Third and Market Streets intersection would operate at LOS B after weekday afternoon games, indicating that much of the ballpark traffic using Third Street would have dispersed by the time it reached this intersection. Mission Street, like Market Street, is a transit-oriented street and it is well removed from the ballpark and would not be expected to attract much ballpark traffic.

The traffic study area was defined and approved by the City's Planning Department (DCP) as part of the EIR work scope. The study area was devised so that roadways and intersections that would most likely be impacted by project traffic were adequately addressed. The traffic study covers the area north to Market Street, which also covers all accesses to freeways and major local arterials. In fact, it would become difficult and impractical to forecast traffic patterns once ballpark traffic travels north of Market Street because of the many alternate routes that motorists can take, depending on their final destinations. Further, based on project trip distribution, a small percentage of ballpark traffic would use streets in the financial district during typical commute hours.

The arterial analysis did not include Sixteenth Street because it is not part of the San Francisco Congestion Management Plan (CMP) network. As noted on p. III.84 of the EIR, the arterial analysis included those portion of arterials located in the study area that are part of the CMP network. The purpose of the arterial analysis was to satisfy the requirements of

the CMP. The intersection analysis provides a more easily understood assessment of conditions and impacts on the street network.

Ballpark traffic destined for southbound I-280 would be likely to use the Mariposa ramp or other ramps further down south so that they would not be competing with other traffic which *must* travel northbound (e.g. East Bay and North Bay traffic).

The most direct access to the ballpark parking lots from I-280 is via the off-ramp at Mariposa Street or Cesar Chavez Street, and then northbound on Third Street. There would be little incentive for ballpark vehicles to take the Sixth Street exit, which would take longer. Post-game ballpark traffic would access southbound I-280 via the Mariposa Street ramp, which is the shortest and most direct path from the parking lots. There is no plan to close the I-280 off-ramp at Mariposa Street after games. Traffic conditions are generally good on southbound I-280 at all times. For more details on how ballpark traffic would affect roadways in the Potrero Hill area, please refer to the Response to Comment section on Traffic Impacts, Potrero Hill Area Traffic.

Rather than showing the project traffic distribution on every street, Figure X.C.5 in Appendix C, p. A.124, only shows the auto trip distribution percentages for major street segments. Therefore, the numbers would not add up to the total distribution percentage as shown in the legend. For example, 30% of autos are destined for the Bay Bridge, and while the numbers shown on the map may not add up to 30%, trips distributed on some routes are not shown, such as the path from northbound Third Street and then right on Bryant then straight to the HOV Ramp. These trips, though not shown in the figure, were all accounted for in the analysis. A note has been added to the figure to clarify this point:

> **Note that the totals on this figure for various streets leading in a particular direction (e.g., to the North Bay) do not add because the figure only shows trip distribution for major streets in the analysis area. The actual analyses included all traffic on all streets in the area, not just the major streets.**

While ballpark patrons might add more traffic on city streets on weekends and might compete with other tourists for parking spaces, a sudden increase in ballpark traffic would likely be noticeable only during the one hour before and after a game, whereas general tourist traffic is more spread out during a day. Further, freeway conditions on weekends are usually less congested than on weekday afternoons and evenings (see Table IV.E.13, p. IV.117), so ballpark traffic would need less time to get on the freeway and thereby have less impact on city streets. In addition, ballpark patrons are expected to park their vehicles either in the dedicated parking lots south of China Basin Channel or in the South of Market and South Beach areas, within a 15-minute walking radius from the ballpark; these areas are generally less of a major tourist attraction point, reducing direct conflicts between ballpark traffic and other tourists.

One of the Giants' goals is to encourage more fans to travel to the ballpark by public transit. The proposed ballpark site would be more conveniently served by public transit and would also be more pedestrian- and bicycle-friendly than the existing stadium at 3Com Park. Baseball stadiums built recently in other city downtowns show a higher attendance and a larger share of transit users among attendees.

History shows Giants fans do not take public transportation because there is not a good public transportation system serving the existing ballpark- 3Com Park. The location of 3Com Park also creates a greater incentive for auto use because the stadium is isolated from other attraction points of the City, and fans need to drive to other places (for entertainment) before and after games. By contrast, the proposed ballpark is located in downtown, which is a transit hub and has easy access to other attraction points of the City (either within walking distance or conveniently served by public transit).

Freeway/Freeway Ramps

Comments

Please be advised that Caltrans will begin construction on the West Approach to the San Francisco Oakland Bay Bridge (SFOBB) in late 1999. This will require the coordination between the two projects. (Harry Y. Yahata, Department of Transportation, Caltrans)

If bridge retrofitting comes online and hangs on then for several years, it really will be a nightmare. (Arthur L. Meader, III)

Far and away the worst problem concerns traffic. It appears that, even with a variety of proposed modifications and ameliorations, traffic at many intersections around the ballpark now and into the future will be at LOS E and LOS F. Words such as "unacceptable" (EIR, Vol. I, p.49), "oversaturation" (EIR, Vol. II, p.99) and "jammed force-flow conditions" (EIR, Vol. II, p.91) do not inspire confidence about how traffic will be moving. Additional freeway backups of 5,000 feet and upwards likewise do not conjure up pictures of a pleasant situation. "F" generally means failure and that's exactly what will be present here. Even LOS E ("poor signal progression, long cycle lengths and high V/C ratios. Vehicles frequently fail to clear the intersection during the first green phase.," EIR, Vol. II, p.99) is really not acceptable if this means an increase in traffic beyond what already is horrendous around the Bay Bridge on ramps at certain times. (Arthur L. Meader, III)

The listed extension time for Bay Bridge approaches is clearly unacceptable. The discussion of 3000' to 5000' lines (.6 miles to 1 mile) has to be addressed with mitigation measures, using some or all of the above listed tools. (Michael Karasik, Bayside Village Associates)

IV.125 - Freeway Ramps: This is hard to understand without a map showing queuing. Queues will be on some of the same streets pedestrians heading to or leaving the ballpark will be streaming down, creating potential problems. Please show the queuing on a map. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Pages IV.125-135, Ramp Queue Lengths: The analysis indicates several freeway on-ramps would have queue lengths of 3,500 to over 5,000 feet. A description and/or maps of what this actually means is needed. For example, to where would a queue length of 5,000 feet eastbound at the Harrison and Essex ramp extend? Harrison Street is one-way westbound west of Third Street. Would vehicles queue on Second Street, how far south? The Draft EIR seems to admit that it cannot even analyze this magnitude of traffic congestion: "back-ups of over 5000 ft. cannot be modeled."

Page IV.126, 5th and Bryant: Why would there be only a 100 foot addition to the queue length on 5th Street southbound from the 5th and Bryant ramp? Should this not be a major post-game exiting route?

Page IV.127, Sterling Street HOV ramp: How would post-game vehicles with 3 or more passengers access the Sterling Street ramp if Second Street is totally congested with traffic attempting to get to the Essex Street ramp, with its 5,000 foot queues? (Steven L. Vettel, Residential Properties Group)

If the Department of Transportation and the City of San Francisco elect not to rebuild the Central Freeway, it will only exacerbate the negative impact of added vehicle trips. (Captain R. J. Hall, Commander, Department of California Highway Patrol, Golden Gate Division)

Response

Reconstruction of the westbound approach of the Bay Bridge planned to begin in 1999 would likely impact ballpark traffic traveling from the East Bay for a game (i.e., pre-game conditions). These pre-game time periods include: weekday afternoons 11:30 - 12:30 p.m., weekday evenings 6:30 - 7:30 p.m., and weekends 12:00 - 1:00 p.m. These time periods do not usually coincide with the peak commute hours of the westbound approach into the City, which usually occurs during morning hours. Therefore, ballpark traffic would have minimal impacts on the Bay Bridge during retrofit of the westbound approach.

Intuitively, when retrofitting of the Bay Bridge takes place, traffic conditions on the Bay Bridge and near the downtown access ramps, with or without the ballpark, could be extremely congested and slow as described by a commentor, especially during weekday commute hours. However, it is very likely that Caltrans would implement some temporary measures to relieve expected congestion. Both commuters and some ballpark patrons would be expected to take alternate modes (e.g., BART and ferry if available) to cross the Bay to avoid congestion during this construction period. As the ballpark is expected to be in use until at least the year 2015, long after the Bay Bridge retrofit in San Francisco would be completed (it is to be hoped), it was not appropriate to prepare the traffic analysis using this scenario.

It would be misleading to depict queuing under "existing-plus-project" of "project-plus-cumulative" conditions graphically since the traffic model does not provide queuing data by street segments, but provides information on the amount of traffic that would be in a queue. Queue lengths were estimated from the approximate number of vehicles leading to a ramp without designating the particular approach that each driver would use to access that ramp. Most ramps in the study area have more than one approach and cars would queue on all of the street approaches to all ramps. In addition, some drivers would choose another ramp or another route rather than wait in long queues. Thus, no individual queue would actually be 5,000 ft. long, but the total queue at a ramp might be about 5,000 ft., adding all lanes from all directions leading to that ramp, and not accounting for drivers who left that ramp access to try another location.

The methodology employed in the ramp queuing analysis for the project could be difficult for many non-traffic engineers to visualize intuitively. When analyzing the project traffic impact on existing ramp-queuing conditions, the traffic model assumed a worst-case scenario that all ballpark traffic destined for the freeways would appear at and near the ramp intersections (e.g. Harrison/Essex Streets) at the same time, and that ballpark traffic would also arrive at the ramps when they are most congested with the commute traffic assigned to that analysis hour. First, all numbers shown in the ramp queuing tables reflect the net increase in the maximum queue length by **approach** (not volume per lane, an approach can have several lanes). The overall queue length that would actually be observed in the field, at least theoretically, would depend on what the base traffic condition is during that time period, which in turn depends on the freeway conditions. Further, the traffic model is unable to provide sufficient information on where and how vehicles would actually queue up. Rather, the model estimates the maximum possible number of vehicles that would add to the existing queues, but does not include existing queues themselves, as the length and location of existing queues varies considerably from day to day.

It would also be impractical to use the model to simulate actual queuing conditions because actual traffic conditions fluctuate when there is congestion. Motorists would change their driving behavior (such as their routes or time) when congestion occurs. For instance, Table IV.E.19 (EIR, p. IV.132) shows that at the intersection of Harrison and First Streets during the post-weekday afternoon game hour (3:30 - 4:30 p.m.), project and cumulative traffic would add 4,500 ft. of queue to the westbound approach. This number actually includes vehicles waiting on all possible routes and in all lanes on those routes that eventually lead to the westbound approach at the intersection (i.e., the queue is multi-dimensional). In other words, these vehicles could be coming from Main Street, Spear Street, The Embarcadero, and the queue might spill into some alleys as well. As a result, simply adding the model-estimated queue length to the existing queue in one direction would be misleading, over-stating actual conditions. Therefore, the queue lengths should be used only as a means of estimating the **relative** increase in queues at ramps.

The majority of ballpark traffic would be coming from the dedicated ballpark parking lots and lots and garages in the eastern South of Market area near the ballpark; the most direct route to access the Bay Bridge is via the Sterling (HOV) ramp or the Harrison/Essex ramp. If Second Street became too noticeably congested as the queue on Harrison Street backs up, ballpark traffic destined for the Bay Bridge might use the Fifth and Bryant Street ramp to access eastbound I-80. However, this number of vehicles is not expected to be high after a weekday afternoon game because the Fifth and Bryant Street ramp would likely be congested already, and ballpark vehicles (likely to be carpooling) are assumed to take advantage of the Sterling Street HOV ramp to access the Bay Bridge. Therefore, there would be relatively few ballpark vehicles accessing the Bay Bridge via the Fifth/Bryant ramp after an afternoon game.

An alternative route to reach the HOV ramp to the Bay Bridge from Sterling Street would be via The Embarcadero to westbound Bryant Street (as opposed to eastbound by way of Second Street). This could also relieve some congestion on northbound Second Street. While ballpark traffic is expected to add to the queuing problems near the freeway ramps, the recommended post-game traffic detour and routing plan (described in Chapter V of the EIR) would alleviate congestion along northbound Second Street. In fact, field observations have indicated that the level of service and queuing conditions on and near the ramps leading to the Bay Bridge are highly dependent on the traffic condition on the bridge itself. When the bridge is not congested, the ramps also operate with very little delay. The analysis results presented reflected a worst case scenario (i.e., congested conditions on the bridge), which, unfortunately, is not an uncommon situation on weekday afternoons.

On-ramp traffic conditions to southbound U.S. 101 (from Harrison/4th Streets) also depend in part on operations on the Central Freeway. The future status of the Central Freeway is being examined, and reducing delay on freeway mainlines and local streets would likely be a key element during the selection process of a Central Freeway alternative. Improved traffic conditions on U.S. 101 would also have a positive impact on traffic in the whole downtown area.

Arterials

Comments

The "Non-game Day Scenario" at IV.141 itself is hard to understand. This should also be mapped so there is some ability to compare the increase in problems. Is a hotel at Pier 40 included in this projection? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page III.77, Bryant Street: Bryant Street serves a residential and live/work area between Second Street and the Embarcadero, not just between Beale Street and the Embarcadero.

Page III.85, LOS F arterials: Explain why street segments already at LOS F are not subject to the deficiency plan requirement. (Steven L. Vettel, Residential Properties Group)

Page IV.141, Embarcadero LOS: Draft EIR indicates that the Embarcadero in both directions between Second Street and Howard would deteriorate from LOS D to LOS F northbound and LOS C to LOS F southbound on *non-game* days (i.e. 365 days/year). This is a significant adverse impact on this residential area. What mitigation or project modifications (such as decreasing the size of the restaurant) are proposed? There appear to be none proposed. (Steven L. Vettel, Residential Properties Group)

Response

Arterial and intersection levels of service under the "Non-Game Day" scenario were tabulated and discussed in the text (Table IV.E.22, pp. IV.142 - IV.143). As this scenario changes the level of service at one study intersection, mapping the changes should not be necessary. The travel forecast for cumulative scenarios incorporated all projected growth in the City and the greater Bay Area as defined in the MTC model (under ABAG assumptions in *Projections '96*). The San Francisco Waterfront Land Use Plan was included in the cumulative scenario (EIR, p. IV.106). The development scenario described as Alternative A in the Waterfront Plan, which does not include a hotel at Pier 40, was assumed for the ballpark transportation analysis.

Bryant Street serves a residential and live/work area between Second Street and The Embarcadero, as opposed to between Beale Street and The Embarcadero. The first sentence in the first full paragraph on p. III.77 has been corrected:

Located three blocks (a ten-minute walk) north of the project site, Bryant Street serves primarily retail commercial/residential-oriented uses west of Sterling Street and a residential area between ~~Beale Street~~ Second Street and The Embarcadero.

Roadways on the Congestion Management Program (CMP) network that were measured at LOS F in 1991, the first year of the CMP, are not subject to requirements for preparation of Deficiency Plans. Under California statutes, these roadways were "grandfathered" into the CMP network. The grandfather exemption, however, does not exempt the lead agency preparing an EIR from identifying possible mitigation measures if significant impacts are expected from the proposed project. Mitigation measures have been included in the ballpark EIR in Chapter V to help relieve congestion on many arterials in the study area.

Arterial levels of service are strictly dependent on the level of service of the intersections along the arterial. The level of service of an arterial is related to the time required to travel a given distance. As a result, if an intersection is congested, it would require a longer time to complete that distance and would result in a worse level of service.

The deterioration of the arterial level of service on The Embarcadero between Second and Howard Street on a non-game day was due to increased delay at the intersection of Second and King Street near The Embarcadero (where the driveway to on-site parking is proposed). The transportation analysis for the EIR required that the existing signal timing be used when determining the level of service for intersections. Since signal timing for the intersection at Second and King (i.e., The Embarcadero) was based on the 1996 signal timing plan, some turning movements received very little green time. Therefore, the overall intersection delay would increase drastically when project traffic was assigned to those movements, thus worsening the level of service. In reality, the traffic signal at this intersection would likely be re-timed upon completion of the project (as is often done by the City's Department of Parking and Traffic when changes in daily intersection operations call for revisions in signal timing) so that the level of service of this intersection would improve, which would in turn improve the arterial level of service.

If the amount of parking proposed on the ballpark site were reduced to 50 spaces, as is currently under consideration (as well as removal of the centerfield restaurant), from the 180 spaces analyzed in the EIR, non-game day effects at this intersection would not cause substantial reductions in LOS and the arterial conditions on this segment of The Embarcadero would not likely degrade as substantially as is shown in the EIR.

Intersections

Comments

Page IV.140. First paragraph. This paragraph points out that the LOS improves on some arterials between "existing plus project conditions" and "cumulative plus project conditions." This improvement is attributed to "traffic signal optimization" which is "routinely done by the Department of Parking and Traffic." What is the basis for this conclusion? More information is needed to substantiate this conclusion.

If "traffic signal optimization" is routine, why does one have to wait until the year 2015 to see system improvements? Why can't traffic signals be "optimized" sooner? What is the city's program for signal optimization? When was it last done? When will it be done again? How is the effectiveness of "signal optimization" measured? Is there an "end state" optimal traffic signal configuration for San Francisco? (Rincon Point South Beach CAC)

Table IV.E.25: Is this a "game day?" Because other nearby tables are labeled, this one should also indicate this fact. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The methodology employed in the EIR for analyzing arterial and intersection levels of service is one that is typically used for traffic studies. Traffic signals in San Francisco operate with a pre-determined timing/phasing scheme so that the green times can effectively be utilized. The City's Department of Parking and Traffic (DPT) staff regularly collect field data and adjust the signal timing accordingly to ensure maximum efficiency (i.e., signal optimization). In fact, the City of San Francisco employs a short-cycle signal timing system which is extremely efficient in handling busy traffic, especially in the downtown area where traffic volumes are usually balanced on all streets.

When the "existing-plus-project" conditions were analyzed, it was assumed that the signal timing would remain as it is right now, which provides a worst-case scenario. In reality, DPT would adjust traffic signal timings based on travel demand, especially when new development is occupied.

Year 2015 is only a horizon year used specifically for analysis purposes. As said, DPT staff routinely optimize signal timing and would do so upon a determination of need due to travel demand growth in an area. It was estimated in the analysis that by year 2015, cumulative development would have occurred as assumed in the ABAG *Projections '96* and that this development would have increased traffic volumes on local streets, establishing a demand for signal timing changes. Therefore, it was also assumed that these changes were carried out.

The commentor is correct in assuming that Table IV.E.25 refers to "Game Day" conditions. The table title on pp. IV.146 - IV.149 has been revised to read:

Summary of Project Intersection Levels of Service, Game Days.

Comment

Page IV.151, Figure IV.E.2: It seems peculiar that all the Third Street intersections are at LOS F, while both Second and Fourth Street intersections are at LOS A or B. Is this correct? (Steven L. Vettel, Residential Properties Group)

Response

The intersection levels of service as shown in Figure IV.E.2 on p. IV.151 of the EIR represent the traffic condition following a weekday afternoon game. Northbound project traffic exiting from the dedicated parking lot destined for the Bay Bridge, the North Bay, or other parts of San Francisco north and west of the project site are assumed to use Third Street since it is the most direct route leading to the freeway and other areas. By contrast, Fourth Street is a one-way southbound arterial and is not expected to absorb much project traffic. Second Street south of Brannan Street is not expected to absorb a large amount of ballpark traffic for several reasons. Brannan and Townsend Streets are two-way streets and traffic destined for the Bay Bridge would have to turn left on Second Street, which would not

be as convenient as traveling northbound on Third Street to Bryant or Harrison Streets before turning right and continuing to the Bay Bridge. Many drivers would choose to use the Sterling Street HOV lane from Bryant Street; some would use Third Street to eastbound Bryant, and considerable numbers, especially those parking in the South of Market area and the South Beach area garages and lots, would approach Sterling Street from westbound Bryant via The Embarcadero, rather than via Second Street. It is important to note that this figure depicts a condition assuming there is no detour plan or any parking control officers on duty, so Third Street would be open to traffic from the dedicated parking lots. Results of this unmitigated analysis could be a bit extreme, as some kind of mitigation is likely, but for an EIR the analysis is carried out without mitigation measures in place when the measures have not been included in the proposed project.

Charter Bus Routes

Comment

Page IV.216 2nd to last paragraph. By what route are charter buses coming from the East and North Bay going to get to the South of the Channel parking areas? (Rincon Point South Beach CAC)

Response

Charter buses would be coming from the North Bay and East Bay via the same routes as other vehicles, using the regional bridges and freeways and local streets. No special exclusive access routes are proposed. They would load and unload passengers in or near the dedicated parking lots south of the Channel. Before games Fourth Street would be a primary charter bus route, after games or events Third Street would serve charter buses. If a traffic routing plan similar to that described in the mitigation section of the EIR, Chapter V, were included as part of the project, Seventh Street would be an alternative route for charter buses, both before and after events. See Transportation and Circulation, Transportation Mitigation, *Charter Buses*.

Berry Street Closure

Comments

IV.81, Assumed Roadway Improvements: Closing of Berry Street as proposed by Catellus should be assumed so that the impacts of this change can be assessed. If these changes are significant then a mitigation could be added to not close this roadway segment. (Diane Nygaard)

Lacking Analysis of Reasonably Foreseeable Impacts: The conclusion of the effectiveness of the only offered Transportation Mitigation Measure is flawed. This mitigation measure does not account for the planned permanent closing of Berry Street between Fourth and Sixth in the development of Mission Bay North by the Catellus Development Corporation. Again, this must be discussed since the development of Mission Bay North is not speculative nor uncertain. (David P. Cincotta, representing China Basin Landing, Ltd.)

Our proposed traffic and circulation plans for the North of Channel Mission Bay site call for Berry Street to be vacated from Fourth Street to Sixth Street. Fourth Street would be closed to vehicular traffic and would likely provide pedestrian/bicycle access. The draft EIR assumes that Berry Street will remain open through the previously mentioned road segments. We request that additional analysis be undertaken to determine the impacts, if any, based on the closing of a portion of Berry Street. (Donald M. Parker, Vice President, Catellus Development Corp.)

Response

The traffic analysis in the EIR included certain assumptions about how existing traffic flows would change once the reconstruction of King Street and the completion of the I-280 ramps into King Street occurs. While Berry Street currently carries a substantial amount of traffic, this is due to the I-280 northbound off-ramp that now exits onto Berry Street at Fourth Street. When this ramp closes, the traffic on the ramp will divert to King Street. As a result, Berry Street will have very low traffic volumes. If Berry Street were to remain open between Sixth and Fourth Streets, its primary future purpose would be to provide access to the proposed Mission Bay North housing located south of King Street between Sixth and Fourth Streets.

Catellus Development Corporation is considering requesting closure of Berry Street as a through street as part of the Mission Bay North conceptual plan now under review in City offices. If Berry Street were to be closed between Sixth and Fourth Streets, the ability of

drivers to access the area west of Fifth Street from Third and Fourth Streets would be limited, particularly as there is no planned left-turn from westbound King Street into southbound Fifth Street and Fifth Street will continue to be interrupted between King and Townsend Streets by the CalTrain rail yard.

The result of closing Berry Street in this area would be an increase in traffic on King Street and the King Street frontage roads between Third and Sixth Streets as traffic would gain access to Berry Street via its connection with the King Street frontage road near Sixth Street.

An analysis of the existing-plus-project Level of Service for the weekday afternoon post-game (3:30 - 4:30 p.m.) period was conducted for the following intersections, assuming closure of Berry Street:

Intersection	Level of Service Change
King Street at Fourth Street	C to C
King Street at Third Street	F to F
Berry Street at Third Street	D to D

As shown, in no case did the level of service change on nearby streets due to the closure of Berry Street between Sixth and Fourth Streets.

This section of Berry Street is not likely to serve any major vehicular traffic volumes before and after ballpark events because it is presently not well developed west of Fourth Street and because it would be undesirable to route ballpark traffic through the residential area if development is approved and built. Catellus Development Corporation is considering whether to keep this section of Berry Street open for pedestrians and bicycles.

For further discussion of Berry Street, please refer to responses under Transportation and Circulation, Analysis Assumptions, *Traffic Assumptions*.

South Beach Area Traffic

Comments

As to the traffic and parking analysis, and that really was the No. 1 concern of almost all of the respondents to our 4,000-plus surveys, it is really an exhaustive traffic analysis. I'm sure one like that hasn't been done in an awful long time, but it confirmed what we already know in South Beach, which is we have tremendous backups already existing getting on to the freeways in the neighborhood. We knew that already. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

The traffic and parking analysis in the Draft EIR is undeniably one of the most exhaustive done on the South of Market area in the last decade, and confirms what the neighbors have always known. That is that the already existing South of Market (and especially South Beach) commute hour traffic to the Bay Bridge, to 101 South, and to I-280 is a tremendous disruption to the neighborhood, on a scale never before acknowledged by the City. (Rick Mariano)

It also does not address how the residents will get to their homes in times of traffic. I think that needs to be thought through. For example, there are only a few streets, such as Second Street, that would provide access and maybe some limitations to buses or other things. I think the EIR needs to look at how those people are going to get to those units. (Mike Gray)

We [Portside residents] straddle both sides of the Bay Bridge. We are bounded by Harrison, Main, Bryant and the Embarcadero. Presently, we do not -- during the commute hours, we don't have much access in and out of our area. With the ballpark, we will be in actual gridlock. The draft environmental impact report shows that the corridor bounded by Harrison and Second Street will be increased with the product to a Level of Service F. That will create a virtual barricade from going in and out of the South Beach and Rincon Point and South Park Area. (Barbara Inaba)

I noticed that the Clocktower, 355 Bryant, [and] 601 Fourth Street were not taken into account in the report. It is already difficult to fight the traffic of the Bay Bridge at rush hour (3:00 p.m. to 7:00 p.m.), and a deterrent to my customers at times. (Elizabeth Carney)

I see a lot of parking and transportation problems, traffic flow. Maybe Mariposa Street should be cut off. I see, though, the problems in South Beach because I live there. I look out my alley, and sometimes when we have a series F gridlock, I see people fighting, and I have to break up fights. I have done that. There is omitted in the map, but the street that goes through Bay Side Village is omitted there, and that just log jams. When that log jams, people are driving on curbs. People are going both ways. People are yelling and screaming. It is nuts. I have gone out there and directed traffic. I also commend transportation and parking because they are out there directing traffic. As an umpire, you use your hands and get them moving. And they have done a good job. And if they can cut off the traffic from going into Bay Side Village, that would be great. (Ben Lubbon)

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: ...[c]ontinued day/night vehicle access...We don't believe that the current plans for this item, as we understand them, will permit free and clear access to our parking lot/building site as always before over the last twenty five years. This access must be maintained. (Ship Clerks' Association, Local 34, ILWU)

Other issues of concern [to the South Beach area] includ[e]... vehicular access to the neighborhood... [are] nowhere analyzed...[T]here is no quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel)

Response

Concerns about traffic congestion in the South Beach area raised by South Beach citizens are understandable, given that congestion already occurs in the neighborhood during commute hours, especially on routes that lead to the major freeways. It is important to note that rather than solving existing congestion problems, it was the intent of the EIR to assess potential impacts that would be caused by the proposed ballpark and to recommend mitigation and improvement measures that would minimize these impacts. The EIR describes the impacts on streets and intersections in the South Beach neighborhood, including The Embarcadero between Second and Howard Streets, Bryant Street between Fourth Street and The Embarcadero, and Harrison Street between First Street and The Embarcadero, and including the intersections of The Embarcadero with Townsend, Brannan, Bryant and Harrison Streets as well as intersections along Second Street between King and Folsom Streets (see pp. IV. 115 - IV.172 for the traffic impacts analysis in the EIR). Page IV.144 specifically notes that persons traveling to the South Beach and marina areas could experience delays due to ballpark traffic. Despite delays, access would be maintained to all properties.

The Giants' game schedules have been established such that ballpark traffic impacts on local streets and background commute traffic would be minimized. The majority of these weekday afternoon games, scheduled to begin at 12:35 p.m., would end at about 3:30 p.m., just before the background afternoon peak hour, which generally begins between 4:00 and 4:30 p.m. While there would be times where a ballgame might last more than three hours and ballpark traffic would thereby spill into and conflict with peak commute traffic, it happens, on average, 30% of the time, meaning that there would be an average of four games per year

that ballpark traffic would directly conflict with background commute traffic. A longer game does not necessarily preclude the fans from leaving the game early, and some would, to "beat the traffic." As explained above, under *General/Traffic Study Area*, and under Analysis Assumptions, *Game Times*, occasional non-baseball events occurring on a weekday could end in the p.m. peak period and contribute to commute traffic, including in the South Beach neighborhood. This situation is discussed in more detail and analyzed in the referenced sections. See Project Description, Uses of the Ballpark.

On ballgame days, if a traffic routing plan is adopted that includes closure of part of King Street (likely to be between Second and Third Streets), traffic in the South Beach area would increase as described in Chapter V of the EIR (pp. V.32 - V.40). As identified in Table V.B.3, most intersections in the South Beach area (such as the ones on Brannan, Townsend and King Streets) would operate at LOS F before and after a game under the traffic routing plan described in the EIR, indicating that a traffic detour alone, without improvement measures, would cause substantial impact in the South Beach neighborhood.

In short, ballpark traffic would cause some impacts on access to the South Beach residential neighborhood but impacts could be reduced with future traffic routing plan that includes mitigation measures and improvements similar to those described in Chapter V, and with a ballgame schedule that minimizes direct conflict between ballpark and commute traffic. It is especially important to note that if a game ends at a time outside of the background peak period (i.e., when major arterials have little congestion), there would be no incentive for ballpark traffic to intrude into the neighborhood streets to find short-cuts, and local traffic would not be impacted. In addition, a Ballpark Transportation Coordinating Committee is recommended in the EIR mitigation discussion to oversee the traffic detour plan and minimize traffic impacts on nearby residential neighborhoods; see Transportation and Circulation, Transportation Mitigation, *Ballpark Transportation Coordinating Committee.*

South Beach Park/Marina

Comments

Harbor tenants should not be compelled to negotiate their way past vendor trucks and other game uses to access the underground structure. Strict policing, and its costs, must be borne by the Giants. (Doug Gooding, CAC member)

Limited access via automobile: While we certainly realize some impact is inevitable, boaters need to be able to move clothing, food, and equipment on and off boats. They need to be able to at least load and unload cars nearby. Public transit is not adequate when heavily burdened.

The parking garage seems marginally adequate (to me, at least). However, will we be able to get to it? The entrance is right at the ballpark, presumably in the heart of the traffic. The entrance will be shared with delivery trucks.

The impact of traffic on the marina needs to be studied, and if found significant, mitigated. Possible mitigation might be a "residents" traffic lane and appropriate auto identification.

A speaker after me suggested that boaters would "adjust their habits" to avoid conflict. Without commenting on his attitude, I want to point out that this is not always practical. Tidal currents past the marina often reach three miles per hour. Currents reverse four times per day from generally northbound to generally southbound. A typical non-racing sailboat does not go faster than six miles per hour through the water. Going against the current would result in a speed over the ground of three miles per hour, and with the current, the speed over ground would be nine miles per hour. Reaching a destination 9 miles away would take three times as long if the currents are unfavorable. (Richard Locke, Jr., South Beach Yacht Club)

Access to South Beach harbor at times critical to boat owners will be difficult, if not impossible. Parking for crew and guests is non-existent.

Traffic will be impossible. No debate on this. It is a fact. (Maria Woodard, Orville Pitney, John H. Super)

Harbor Access & Harbor Tenant/Guest Parking. Too many assumptions have been made by the Redevelopment Agency in their current plan to build harbor parking at the end of a driveway shared with Giants, restaurant, media and delivery trucks. How many cars can move in and out before, during and after events when the entrance is at 2nd and King, which is shown as not accessible. Regular use of our boats berthed at South Beach Harbor requires loading access to transfer gear and supplies/provisions for boating use to and from vehicles. This requirement requires close proximity vehicle access to all of the gates leading to South Beach Harbor piers. Harbor tenants have always been provided with 2 parking permits per slip, permit designated parking spaces and harbor guest/visitor designated parking spaces,

what happens to these privileges that are part of our lease agreements with South Beach Harbor and the San Francisco Redevelopment Agency? Permits issued to boat owners cannot be transferred to event patrons. How is that controlled? How do harbor tenants and their guests even get to their boats in the harbor on event days? Harbor tenants must be provided with temporary parking during the entire construction process. None of this has been examined in your draft report. (Mark Miner)

The traffic study ignores the effect that traffic flows will have on harbor tenants attempting to access the marina. Missing from the D-EIR is the critical fact that peak harbor usage coincides almost to the minute with peak stadium traffic, particularly on Friday evenings and weekends. Also missing is the fact that over 50% of the harbor tenants are believed to come to the harbor from points south--primarily the Peninsula. Missing from the EIR is any analysis on difficulty harbor tenants will encounter trying to gain access to the underground parking in the midst of game or event traffic. (Doug Gooding, CAC member)

Amazingly to me, no analysis was done on the effects of the ballpark on the harbor in terms of... traffic into the underground garage which is shared by the Giants and the harbor tenants, or any other area of impact. This omission must be rectified. (Rick Mariano)

The garage under the [South Beach] park will have an unfavorable impact on the park creating a traffic conflict between pedestrians and those arriving by public transit cars and charter buses, all coming into the area at the same time during commute hours and games and special events. Surely this requires more attention. (Jane Morrison)

The proposed ballpark will be constructed adjacent to South Beach Marina, an existing, water-oriented recreational facility authorized in BCDC Permit No. 2-84. A number of the occupants of that marina have contacted the Commission staff raising concerns about potential ballpark impacts on the marina. These concerns have included: (1) a reduction in vehicular access to the marina, particularly during ballpark events when Lefty O'Doul Bridge will be closed to auto traffic for extended periods of time. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

The San Francisco Redevelopment Agency is considering plans to modify the access and parking configuration for the South Beach Park as part of a park extension project. As noted on p. III.29 in the EIR Setting section, a driveway at the south end of Second Street at its intersection with King Street would provide access to an underground parking facility for the Marina. This same driveway and access road would serve the ballpark parking facility and the loading dock area that are proposed to be under the right-field bleachers.

There are now several parking options under consideration by the Redevelopment Agency for the Marina. In addition to the underground structure, a surface lot is being considered with no expansion of the park. Another alternative might be to provide additional parking on Pier 40. This discussion focuses on the access and control issues related to the underground structure. Most of the discussion would apply to a surface lot as well.

Before and after baseball games, vehicles that would be parked at the on-site parking lot in the ballpark would likely cause some delay to other vehicles that are accessing the Marina at the same time. The impact could be worse if other ballpark vehicles (from the dedicated parking lots) chose to arrive or depart the area via the intersection of Second and King Streets. The preliminary traffic routing plan described in Chapter V of the EIR calls for the closure of King Street between Second and Third Streets. The intersection of Second and King Streets would remain open under the control of PCOs. Access to South Beach Marina parking and the ballpark parking/loading would be possible via either Second Street and The Embarcadero/King Street. It is inevitable that traffic desiring to access or egress the Marina parking area during the period before and after games would experience some delay and inconvenience, as there is likely to be traffic congestion and delay on both The Embarcadero and Second Street. Also, persons unfamiliar with the traffic routing patterns before and after games would likely experience some unexpected inconvenience. For example, a person driving north on I-280 who would normally use the new ramps directly into King Street to reach the Marina, would be re-routed via Brannan or Townsend Streets to Second Street.

However, it is important to note, as is documented in the impacts chapter (Chapter V) of the EIR, that without the traffic routing plan conditions it the area would be much worse. For example, after a weekday afternoon game (3:30 - 4:30 p.m.) the intersection of Second and King Streets would operate at Level-of-Service F without the traffic detours. With the detours it would operate at Level-of-Service D.

It is likely that some sort of control on use of the Marina parking would be desirable in order to assure availability for Marina users. Similarly, the Giants would control use of the limited

on-site parking under the ballpark during games, but they would also want to control the use of this parking at all times. During ballgames, the Marina parking would need to be protected to prevent use by ballpark fans seeking convenient, low cost parking. See Parking, *South Beach Harbor Area Parking*, for suggested improvement measures to control the use of Marina parking.

South Park Area Traffic

Comment

In South Park alone there are roughly 200 residents and there are approximately 50 businesses. How are these users going to be impacted if they are unable to have access during game congestion? (Louise Bird)

Response

As shown in the EIR (p. IV.141 and Table IV.E.22, p. IV.142), existing traffic on Third Street between Berry and Market Street operates at LOS F during the p.m. peak hour (4:30 - 5:30 p.m.) and at LOS C during the preceding hour (3:30 - 4:30 p.m.). With ballpark-related traffic, Third Street would deteriorate to LOS F during the 3:30 - 4:30 p.m. hour. The intersections of Third Street with Brannan and Bryant Streets would operate at LOS F during the hour after a weekday afternoon event at the ballpark, as would the intersection of Second and Bryant Streets (see pp. IV.144 - IV.156, and Table IV.E.25, P. IV.148). Thus, it could be difficult for South Park residences and businesses to obtain access by car during the hour after weekday afternoon games, somewhat similar to the condition that now exists on many weekdays during the p.m. peak hour.

Under the proposed traffic routing plan described in Chapter V of the EIR, signs and barriers would be used to prevent ballpark traffic from entering South Park from Second or Third Streets. After ballgames South Park residences and businesses would experience delay in accessing or egressing the area due to ballpark traffic. Before games, ballpark traffic on Third Street would be minimal, but after games, Third Street is a prime ballpark traffic route. Second Street would be used by some ballpark traffic before and after games, but it would not be a primary traffic route, especially the section south of Bryant Street. PCOs

would be stationed at critical Second Street intersections to expedite traffic flow. Access to and from South Park using Second Street should be viable before and after games, although some delay is likely.

Potrero Hill Area Traffic

Comments

Re-examine ballpark generated traffic flow on Pennsylvania, Vermont and Mariposa Streets. Experience and observation by Potrero Hill residents indicates that traffic flow is more intense than identified in the DEIR. (James Haas)

(III.80) Mariposa, 16th and 17th Streets will be heavily impacted.

(III.86) The LOS studies for intersections south of the site are not adequate. (Mariuccia Iaconi)

IV.127, Freeway Ramp Impacts: The congestion on U.S. 101 will result in significant diversion of cars onto I-280 with a resultant increase in use of neighborhood streets at Mariposa, Pennsylvania, and Caesar Chavez. It is ludicrous to assume that fans accessing the park from the south will drive to an exit north of the parking areas, and then drive through the most congested area at the Lefty O'Doul bridge to get to parking. What they will do is exit the freeway south of the channel, and then drive through residential streets to parking- either the designated lots or other on- and off street parking to the south.

Local traffic impacts on Mariposa, Vermont, and Pennsylvania Streets is a critical issue, has been raised on numerous occasions, and has been blatantly ignored. (Diane Nygaard)

(III.67 Interstate 280) This section does not mention Pennsylvania which fans will use as an alternate to 280 South or Third Street when traffic is LOS F on 280 south. Queuing already occurs on Pennsylvania at different times of the day. (Mariuccia Iaconi)

I believe the majority of voters on Potrero Hill voted against Proposition B (which approved a privately funded stadium) not because they are against a new stadium or do not like baseball, but because they knew that it would be exceedingly difficult to build such a stadium in China Basin without severely affecting the neighborhoods surrounding this area and the greater San Francisco area as well. A thorough reading of the Draft EIR has proven these fears to be well founded. Not only is Potrero Hill excluded, or mentioned with the intent of exclusion, in many key sections of the Draft EIR, but many of the conclusions drawn in the Draft EIR are clearly illogical and misguided. The most significant of these conclusions concern:

- Automobile traffic patterns, routing and queuing. (Sarah Ames)

I notice that they didn't talk about this space between Vermont Street and the 280 exit and entrance on the freeway. One of the things that is happening now is that I can't back out of my driveway. There is so much traffic during the day. My kids can't ride their bikes. It is a very congested area already. (Yvonne Gavre)

I...want to reinforce Yvonne's [Gavre] statement on Mariposa Street between the 280 entrance and the Vermont Street exit. That's going to become a freeway itself. We are now building live-works along Mariposa Street and they are dumping their traffic. We have one project with six cars backing up into it, another one that wants to do 50, all backing into Mariposa on Pennsylvania, which is one block away from the 280 entrance. So, we have got a lot of traffic that is going to be dumped on Mariposa backwards. It is going to be misery. (Dick Millet, Potrero Boosters and Merchants Association)

[We believe] that the traffic flow, Potrero Hill and Pennsylvania, Vermont and Mariposa Street[s are] inadequately dealt with, as we made reference to the South Beach Harbor, and it needs more work[, as does]...the closing of the bridge. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

What freeway exits will autos use to access the South of Channel lot? How will the use of the Mariposa exit affect the Potrero Hill neighborhood? (San Francisco Tomorrow Waterfront Committee)

I am writing to express my deep concerns about the Ballpark on the China Basin. I do emphatically request that this proposal be reconsidered because [it] is WRONG WRONG WRONG. To think that the Planning Commission will consider to disrupt our residential community by creating a living traffic and parking nightmare. You are going to simply encapsulate an entire community and that is not right. (Martha Flores)

I live five doors from Mariposa Street. There are many young children on our block who must cross Mariposa Street to reach Jackson Playground at Mariposa and Arkansas Street. The volume of traffic that will travel on Mariposa is very dangerous to these young people. I view the Vermont Street exit from the 101 to be a major problem. Many of those drivers will head East on Mariposa Street to either Mississippi/7th Street or 3rd Street to access the ballpark. I believe Vermont Street needs to be closed to non resident traffic on event days to keep people from racing across Potrero Hill to access the ballpark. (John B. deCastro)

[T]he DEIR draws implausible and unrealistic conclusions concerning traffic exiting and entering both I-280 and U.S. 101. The DEIR's statement, that traffic should be discourage[d] from entering residential neighborhood areas is accurate, however, the report continues on to conclude that "Generally, I-280 would not experience congestion before and after ballpark events; consequently it is not expected that ballgames would stimulate a substantial diversion of traffic onto neighborhood streets from Mariposa and Pennsylvania Streets."

This conclusion is inaccurate. I-280 currently experiences congestion and back up during many afternoon hours and, on April 1st, after a Giants game at Candlestick with a small

crowd, northbound congestion was observed stretching from the I-280 off-ramp at Sixth Street [past] the Mariposa I-280 off-ramp which is a mile South on I-280 (See page 7, photographs). This mile back up on I-280 was the result of North Bay and East Bay fans returning home from a lightly attended Giants game.

When current I-280 traffic is combined with an added 40,000 fans trying to reach a ballgame or 50,000+ fans trying to reach a concert event in China Basin, it will create significant congestion and the free flowing conditions on I-280 that are expected to (according to the DEIR) eliminate fan traffic on the U.S. 101 and prevent "intrusion by automobiles" into residential neighborhoods, such as Potrero Hill, will not exist. As a result, fans trying to get to the designated parking will not bother trying to drive through congested segments of I-280 and U.S. 101 to reach the North side of the China Basin Channel (exits at 4th, King and Sixth Streets) only to have to cross back to the South side of the channel over a small two lane bridge to get to the parking lots (as the DEIR predicts), but will instead logically exit at the Vermont Street off-ramp and drive down Mariposa Street, and at the Cesar Chavez I-280 off-ramp and drive down Pennsylvania Street to reach Third Street and the designated parking (See page 9, Figure II.D.5). Both of these routes are more direct and convenient and will thus be used by game going and concert going fans unless access is denied.

Thus, ballpark and concert going traffic will logically use the Vermont, Pennsylvania and Cesar Chavez on and off-ramps and will travel through the Potrero Hill neighborhood...on Mariposa, Pennsylvania and other residential streets in an attempt to get to the ballpark unless they are denied access. Unfortunately, the DEIR provides for little or no mitigation that will effectively reroute this traffic around the Potrero Hill neighborhood. (Sarah Ames)

Potrero Hill: No study has been done as to the traffic coming through this neighborhood. Northbound traffic will exit 280 at Cesar Chavez (Army), Vermont, and Mariposa to use Pennsylvania, Sixteenth, Third, Twenty Second, and all streets in between as ways to avoid the gridlock nearer the ballpark. (Janet Carpinelli)

The EIR says that there will only be a small impact on the neighborhood, which is one block of Vermont Street. That shows that they do not understand Potrero Hill at all, because that one block that they are thinking of is where they come off of the freeway, and then they -- they are supposed to turn down to Mariposa. Well, if they should not make that turn, they are right in our neighborhood with no guidelines as to where they should go. And if the freeway is backed up, which it oftentimes is, they will come off of that in spite of any signs that you put there saying ballpark patrons go to Seventh Street. And if they turn off that Army Street, where they should, that is backed up, too...

The Vermont Street drop off, as some of you know, is a very hazardous turn off. It makes a 90 degree turn there. And when it was first put in or a little after, there were many accidents there because people would come off the freeway at a freeway speed and keep going, and they would go right into the house right there. They finally put up a fence there, and that didn't help too much, but they are still going in there. And should they make that turn fast enough so that they do not go into the house -- there were people killed there by

going into there -- they will go down the other street, and they can't make the turn back fast enough so they go into the houses on Vermont Street there, the other street.

So, you have to have some way of saying, no, don't take this turn off or you will be killed. I guess I have been around long enough to know there have been people killed. You people are all too young. (Babette Drefke, Potrero Boosters and Merchants Association)

I am concerned about the traffic and parking problems that might arise from the new facility. Apparently, the cars going to the only ballpark parking facility in Mission Bay must exit at 280 Mariposa. Once this exit backs up, the fans will exit 280 at Army and take Pennsylvania to find parking anywhere they can on Potrero Hill.

We are already experiencing more traffic going down Pennsylvania to get on 280. I'm concerned that this will increase and that there will be gridlock. I'm also concerned about the quality of life of our neighborhood, and I hope will you take that into consideration. How would you feel if the same situation were in your neighborhood? (Joan Rosen)

Residents and guests of Potrero Hill will either not be able to get to their homes, or have to drive an obstacle course during stadium event days. (Jerry A. Peterson)

I live one block south of Mariposa Street on Rhode Island. Since there are only a few ways to get off Potrero Hill, any traffic directed through our neighborhood will affect it. To the south, one leaves the Hill by 23rd or Army Streets. To the north, by 17th or 16th Streets. To the east, by Pennsylvania and Third Streets. And there is no way to get off the Hill to the west.

We have more than 10,000 residents who will be virtually imprisoned during stadium events by the estimated 9,000-plus cars exiting the 101 and 280 freeways. To say that our neighborhood will not be affected by traffic is a preposterous error of judgment by the City of San Francisco. (Jean Neblett)

The Potrero Hill neighborhood on Pennsylvania Avenue and Mariposa Street is not a freeway access road. We are a neighborhood. I have some photos I took, three of which -- two were taken at 1:00 p.m. on Pennsylvania Avenue and 18th. One was taken at 4:00 p.m. ... You will see there is no parking at all, and there is also no traffic...When the thousands of cars are coming north on the 280 and 101, downtown traffic will back up immediately. When this happens, the one to two mile backup of cars will exit off of Cesar Chavez at Pennsylvania, Mariposa at Pennsylvania, and Vermont at the 101. The Giants fans will drive on to Potrero Hill at Pennsylvania and Vermont looking for parking and trying to get relief from the one to two mile backup on the 280 and 101. (Sandra Peterson)

My concern is mainly the traffic. Our streets will become freeways. It is almost -- I'm beginning to learn that because it is awfully noisy already. It will be dangerous for children and elderly people and everyone. There is so much traffic around this area. The pollution will be impossible to live with. (Irma Flores)

However, as a Potrero Hill resident and property owner, I want to go on record as appalled that anyone, especially members of the Planning Commission, can agree that the Ballpark will not have a significant, negative effect on Potrero Hill. The Hill undoubtedly will bear the brunt of traffic, parking and congestion problems wrought by events being held at the stadium. It is a prospective nightmare for our neighborhood.

It is incumbent on the City to face this potential disaster and protect our neighborhood. Potrero Hill must be considered in the EIR. (Ellen Kernaghan)

I am also concerned that the flow of traffic in and out of the area will require making several of our streets alternate from one way to the other to allow for entry and egress. Further, freeway exits will be overloaded and clogged during events, creating further disruption in our neighborhood. (Jerome M. Barulich)

[W]e see that Potrero Hill and Lower Potrero Hill (aka Dogpatch) have been blatantly ignored in respect to traffic flow and transportation on days on which games are played as well as other proposed but unknown events. (Mariuccia Iaconi)

(IV.93) Traffic flow will be substantial from the south bay, the majority of fans being from that area. Traffic will arrive via Mariposa from the Vermont Street off ramp, Third Street, either direct from 101 North or from aforementioned route to arrive at the proposed 5000 car garage. Side streets on Potrero Hill and Dogpatch will be overloaded with cars going to and from the stadium.

(a) The proposed parking lot, illogically located on prime land south of the stadium will draw cars through Potrero Hill via Third Street, Mariposa, Vermont and out via Third, Pennsylvania and side streets all over Potrero Hill. (Mariuccia Iaconi)

I am very concerned about the effect of the new Giants ballpark on my neighborhood. With the increased traffic and lack of parking, I fear that both will spill into and inundate our area, as there has been insufficient attention paid to these matters. I would appreciate your directing your attention to how those of us who use the Third Street corridor to get to and from work will do so on the many day/night event dates; using Seventh Street, for instance, will be a huge inconvenience....And traffic: when the 280 backs up with game-goers, won't many choose to get off at Cesar Chavez? Of course. (Ward Schumaker)

(IV.170) Referring to this page, these are unreasonable conditions in the level of service change. Traffic will be swarming all over Potrero Hill in an effort to avoid the traffic jams that will occur.

Figure III E2 does not consider Potrero Hill adequately. 7th Street will be used for access and side streets will be impacted. (Mariuccia Iaconi)

Studying a map of the area south of the stadium site and off of Freeway 280, it is obvious that there is not a solution to the transportation and traffic flow problem. The proposed

stadium is in the wrong place. It cannot be compared to other sites in other cities; this is a unique city and the site is unique. Potrero Hill and Dogpatch will be destroyed as far as quality of life is concerned should this project go forward. (Mariuccia Iaconi)

They claim that four percent of incoming traffic will exit Vermont Street and go down Mariposa. I think they also said 23 or 24 percent of the fans come from the South Bay. If you could please look at the map, the 5,000 spaces that are on Third Street, it is very easy to go take the Vermont Street exit, slam down Mariposa, hit Third and go straight to the Third Street parking. If you draw a little line, it actually is easier than going over the Fourth Street Bridge. (Peter Bouton)

Response

The traffic analysis described in the EIR did indeed take into account potential impacts of ballpark traffic on the Potrero Hill neighborhood. Traffic impact on major arterials and intersections in the Potrero Hill area can be found in Table IV.E.23, p. IV.143 and Table IV.E.25, p. IV.147, of the EIR.

As discussed throughout the Transportation Impact section of the EIR (Chapter IV Section E) and raised in the comments, potential traffic impacts in the Potrero Hill neighborhood would be caused mostly by fans originating from the South Bay and Peninsula, who would arrive at the ballpark via U.S. 101 and I-280.

It is likely that the most noticeable increase in traffic volumes and traffic impacts would occur along Mariposa and Third Streets between the freeway ramps and the dedicated parking lots. There are not major residential areas on Mariposa Street in this area. South Bay ballpark traffic is unlikely to take the exits north of Mariposa Street (e.g. Sixth or King Streets) knowing that they would be "competing" with other ballpark traffic when accessing the dedicated parking lots, and knowing that Mariposa Street would provide the most direct access to ballpark parking lots.

Pennsylvania Street would not experience any substantial use by ballpark patrons. While it has an off-ramp connection from southbound I-280, this ramp is not convenient for access to the ballpark as drivers would have to travel south in order to go north. Even if ballpark

traffic did use this ramp, the impact would be on a very short section of Pennsylvania, between the ramp and Mariposa Street.

The streets and intersections that project traffic would most likely have impacts on were included in the analysis (e.g. Intersections of Mariposa Street at I-280 ramps and Third Street). The following discussion explains in more detail how ballpark traffic would likely impact the Potrero Hill neighborhood. Both pre-game and post-game conditions are included.

Pre-Game Conditions. Motorists would attempt to find the quickest path to arrive at their destinations, in this case, the dedicated parking lots for the ballpark. Fans originating from the South Bay would be traveling northbound on either U.S. 101 or I-280. I-280 would naturally become the more favorable route because it is closer to the ballpark site and traffic conditions on I-280 are generally better (less delay) than U.S. 101 in the vicinity. In fact, vehicle queues on U.S. 101 occasionally back up to near the I-280 split and this fact alone would further discourage ballpark traffic from continuing on U.S. 101.

The most direct and quickest access from northbound I-280 to the ballpark parking lots would be via the Mariposa Street off-ramp and turn left at Third Street and then travel straight up to the parking lots. Some motorists might take the earlier exit at Cesar Chavez Street and travel northbound via Third Street to arrive at the parking lots. As noted, motorists would attempt to find the quickest and most direct path to arrive their destination; there is no incentive for them to drive around in the Potrero Hill neighborhood. Driving on these local streets (with many stop signs) could take longer than the major arterials (e.g., Third Street), even with some congestion. There is also very little incentive for northbound I-280 traffic to access the parking lots via the Sixth Street off-ramp, as the route would be less direct.

Ballpark traffic that was assumed to be coming from northbound U.S. 101, expected to be a small number of cars, would likely choose to exit from the Vermont Street off-ramp and

continue eastbound toward the parking lots on Sixteenth Street. This is the most direct and convenient access from U.S. 101 to the parking lots, leaving no incentive for motorists to find short-cuts in the neighborhood streets. It is important to note that many ballpark drivers exiting from the Vermont Street ramp would not travel eastbound on Mariposa Street because they would know that they would then encounter the I-280 off-ramp traffic; Vermont Street to Sixteenth Street to Third Street (generally not a residential area) would be a more likely alternate.

As shown in Table V.B.1, the level of service of key intersections during the pre-game hour studied for this analysis (6:30 - 7:30 p.m.) would all be at LOS D or better if mitigation measures including a detour plan with improvements, as described in Chapter V of the EIR, were included in the project. Consequently, there would be little incentive for motorists to find short-cuts on neighborhood streets.

Post-Game Conditions. Similar to pre-game conditions, fans destined for the South Bay and Peninsula would seek the quickest route to get on the freeway. However, unlike pre-game conditions, there is no easy/direct access to U.S. 101 from the dedicated parking lots, and South Bay/Peninsula traffic would be most likely to use I-280 exclusively. The most direct route to access southbound I-280 from the dedicated parking lots is via Third Street and then right on Mariposa Street to the freeway ramp. Some ballpark traffic might travel southbound on Third Street for a few more blocks and access the Cesar Chavez ramp. In either case, there are no alternate routes that can provide a shorter and quicker path than the one mentioned above. Therefore, ballpark traffic would be unlikely to drive around in the Potrero Hill neighborhood and attempt to find short-cuts.

It is also important to note that a large amount of "freeway" traffic alone does not necessarily cause delay and congestion on local streets. Rather, the traffic condition on the freeway itself is the key factor; that is exactly what Bay Bridge traffic experiences during rush hours. Field observations have indicated that when traffic on the Bay Bridge is moving at an acceptable level of service, intersections leading to the freeway ramps also have less delay and achieve an acceptable level of service. Unlike the Bay Bridge, free-flow conditions are

generally achievable on **southbound** I-280 near Mariposa Street (despite occasional congestion at the northbound I-280 off-ramp at Sixth Street during commute hours), and ballpark traffic would experience no delay when accessing the freeway via the Mariposa ramps after a ballgame, other than that related to street capacity between the dedicated parking lots and the Mariposa Street ramp.

In short, there would not be any obvious increase in traffic volumes on most residential streets. Potential conflicts, if any, between ballpark traffic and background commute traffic would also be minimized based on the fact that as noted throughout the EIR, only when a game lasts more than three hours (which happens, on average, 30% of the time) would there be direct conflicts. This translates to about four times a year. Non-ballgame events occurring during the day at the ballpark that might add to traffic on freeways and local streets are discussed above, in Analysis Assumptions, *Game Times*.

South of Channel Area Traffic

Comments

The fact that these streets [Illinois Street, Terry Francois Blvd., Mission Rock Street and Mariposa Street] bound the dedicated parking component of this project makes it clear that they will be severely impacted, and I feel it is arrogant for the report to ignore this. I should point out that the aforementioned existing uses along Terry Francois Boulevard are recreational maritime uses. They must be located on the waterfront. There are also commercial maritime uses on this waterfront, including Crowley Marine, seasonal uses by the herring fishing fleet, and the Port's own maintenance facility and the shipyard at Pier 70. There is no consideration of the impacts upon these uses anywhere in the EIR either. (Jeffrey Brown)

[T]he EIR in the area south of the Lefty O'Doul Bridge has been grossly overlooked and understudied. I urge the Planning Commission to overlook these important issues to our boating community. I as an avid boater, fisherman and public launch ramp user of Pier 52 feel that we the users are being overlooked and discriminated against.

I have been using the launch ramp since 1975, and wish to use it many years to come. I am a member of the Bay View Boat Club since 1991, which is adjacent to the public launch ramp. I am concerned about parking being taken away from us in that area for the ballpark parking.

Since our two-lane public launch ramp has been put on hold, I'm afraid that we might lose our public launch ramp also. I feel it is important to preserve our maritime history and keep our public access to boating and waterways accessible. (Peter Borodin)

Therefore there is no examination of the parking or thoroughfare problems which this neighborhood [the South of Channel/Mission Creek area] will incur. (Philip DeAndrade, Mission Creek Harbor Association)

It is not true, for instance, you won't be able to get to the boat ramps at Mission Rock. If you attend ballpark activities, the traffic is predictable a couple of times coming and going. I think people will be able to adapt to the traffic patterns, get into the boats at the times before people start heading to the park and leave at other times. (Art Siegel)

As you know, the only public launch ramp in San Francisco is on Terry Francois Blvd. This area can at times be difficult for the public to use as it currently is. The construction of the ballpark at the China Basin waterfront area will only make this problem bigger. Towing a boat through San Francisco is difficult enough without discovering street closures and traffic rerouting at or near the boat ramp. (Mike Hempel)

I have talked to many people as a supporter of the ballpark trying to convince fellow tenants of South Beach that we will not be restricted in our access to our boats during events at the new stadium, and that sailing and baseball can co-exist. It is absolutely critical that South Beach Harbor, the public ramp on China Basin St., the Mariposa and Bay View Boat Clubs, Mission Rock and the Ramp, stay accessible and that those with boats are able to park during baseball games. Please address these access issues in your final report and show the kind of forethought that the voters of San Francisco did in approving the stadium by assuring that nothing is lost and that in fact baseball and boating can be a harmonious marriage. (Ely M. Gilliam)

China Basin Boat Launch is the only public launch in San Francisco. Actual loss of the ramp and/or elimination of boat trailer parking is unacceptable and must be mediated...We are prepared to take whatever steps necessary to insure continued San Francisco boat ramp access to the Bay. (Kent T. Woodell, Chairman, Sportsmen for Equal Access)

Access and parking for the small boat marinas, boat clubs and access to the only public launch ramp in SF must be included in the plans for the new ballpark. (Terry Francois Blvd.) (Nick Gravem, Down Works)

Access to the waterfront on China Basin Street for such activities as the City's public launch ramp, several boat clubs, several boat storage areas, a boat yard, several restaurants and general public view and recreation uses will be severely curtailed by the "parking plan for 5000 cars." Making Illinois the main feeder would take care of this problem. (Maria Woodard, Orville Pitney, John H. Super)

Why haven't the impacts of this parking lot on the South of Channel neighborhood been studied? Looking at the map of the proposed parking, it seems clear that it will create access problems for businesses located on Port property east of Terry Francois Blvd. (San Francisco Tomorrow Waterfront Committee)

The Illinois Street right-of-way can be improved and used as primary parking access and egress, allowing the ultimate need for dedicated parking after the year 2015 to be studied without as severe an impact on an active and growing neighborhood. Dedicated shuttle service on Illinois Street or diamond lanes on 3rd Street for shuttle service could be used to supplement the Third Street Light Rail to reduce the traffic impacts on 3rd Street. (Corinne W. Woods, Secretary, Bay View Boat Club)

A few years ago, I went to a baseball game at Candlestick Park and I walked from the stadium to Third Street and up Third Street to 18th Street and home on Potrero Hill. All I could think was "How the creators of Candlestick Stadium could ruin such a residential area?" As I walked from the stadium to Third Street the cars, the buses, the trucks all on these narrow streets not moving, a huge traffic jam nobody moving. Little did I dream that the same thing is about to happen in my neighborhood. I bank and shop on Third and the waterfront. (Roberta Kershaw)

The impact of stadium traffic and a 5,000-6,800 space dedicated parking lot south of China Basin Channel adjacent to the waterfront, even as a temporary use (supposedly to be replaced with a parking garage in the same area) has not been studied in the DEIR. That volume of traffic, and the suggested "mitigation" measures, would have a substantial adverse impact on the water oriented recreation, public assembly (versus private use by stadium patrons), and maritime businesses and industries along the Embarcadero, Terry Francois Blvd. (a/k/a China Basin St.) and Illinois St. from Pier 30-32 south to at least Pier 66.

Access to the only public boat launch ramp in San Francisco, which is in the process of being improved by the Port of San Francisco, would be impossible on at least half of the weekend days from April through September, and on many weekdays. This ramp is used by fishermen, rowers, personal watercraft, trailered power and sail boats. Owners of small boats have no other place to go in San Francisco.

Patrons and guests of existing park and fishing areas and maritime businesses along the waterfront, such as boat and yacht clubs, boatyards, chandleries, boat storage facilities and sail lofts, which are all dependent on their waterfront location, as well as waterfront restaurants, which provide revenue to the Port, would have great difficulty reaching these facilities. Any existing street parking would either be eliminated or taken up by ballpark patrons, and it would be very difficult for businesses with their own private parking facilities (such as restaurants) to retain these spaces for their patrons. (Comment from petition attached to letter by John H. Super, Commodore, Bay View Boat Club, and to letter by Betty A. Boatright)

The Ballpark DEIR discusses, as the apparently preferred alternative, providing 40 acres of dedicated surface parking (5,000 spaces) on property south of Mission Creek Channel owned by Catellus and the Port (II.19, IV. 23)...Port property, either Pier 50 or seawall lots adjacent to the Bay, should not be used for parking. While this parking is characterized as an "interim" use, an "interim" use of 18 years (till 2015) warrants substantially more study than has been addressed in the DEIR.

Using the Mission Bay site (between Mission Creek Channel, 3rd/4th and Terry Francois Blvd. north of Mariposa Street) for parking will create a significant hardship for the existing active maritime, industrial and retail uses along Terry Francois Blvd. It will also severely impact boating traffic using the only public boat launch ramp in San Francisco, the 3rd and 4th St. bridges, and Mission Bay South -- including the proposed UCSF campus. (Corinne W. Woods, Secretary, Bay View Boat Club)

The DEIR states that "the Illinois Street right-of-way should also be considered..., but only if Terry Francois Boulevard is not adequate." (V.34) It should be noted that Mayor Willie L. Brown, in his March 3, 1997 letter to Nelson Rising of Catellus, discussing the Mission Bay South proposal, has committed the City to cooperate with Catellus to terminate rail franchises for abandoned tracks in Illinois St. (p. 6, Item 8). Improving Illinois St. by removing the abandoned railroad tracks and connecting Illinois through to Mission Rock St., while possibly a short term solution (18 years?) to traffic impacts on 3rd St., should be seriously considered and investigated as an alternative to use of Terry Francois Blvd. (Corinne W. Woods, Secretary, Bay View Boat Club)

For waterfront maritime users of China Basin Channel and south to Pier 70, this is a survival issue. We need to know that baseball and boating can co-exist, and that baseball season in China Basin won't mean an end to boating and fishing on the Southern waterfront. We respectfully request that our serious concerns be appropriately addressed in the planning process for the Giants stadium. (Corinne W. Woods, Secretary, Bay View Boat Club)

Impacts which have not been thoroughly enough studied, documented and for which adequate mitigation has not been developed include:

1) Street access and parking for small businesses, non-profit entities, and public facilities (including the only public boat launch ramp in San Francisco) located in the waterfront area.

2) Enhancement and expansion of public access to the waterfront. (Dave Mochel, Penguin Boat Co.)

The DEIR lacks completeness in that it does not examine the impacts South of the Channel:...[There] is no examination of the parking or thoroughfare problems which this neighborhood might incur. (Philip De Andrade, delegate of Mission Creek Harbor Association)

The China Basin waterfront is a precious piece of the natural environment and of San Francisco's maritime tradition. The Giants, too, are important to The City. I am writing to express my strong concern that the maritime uses of this area not be sacrificed for a non-marine use.

Access and parking for the South Beach and Mission Rock marinas, the Bay View Boat Club, the Mariposa/Hunters Point Yacht Club, the San Francisco Boatworks, Pier 66, and the only public launch ramp in San Francisco, on Terry Francois Boulevard, MUST be maintained and included in the plans for the new ballpark. (Abigail A. Grafton, M.A.,

Additionally, Section C of the Initial Study, which addresses Transportation and Circulation issues, neglects to include in Table X.C.2, titled "Study Area Street Classifications" (pages A.100-104), Terry Francois Blvd., Illinois St., Mission Rock St., and Mariposa St. The fact that these streets bound the dedicated parking component of this project makes it clear that they will be severely impacted and I feel it is a glaring omission for the report to ignore this. These streets are vital to the day-to-day operation of many existing uses. The streets south of the channel which bound the dedicated parking should be included in this report.

In October of 1995 I was asked to serve on a citizens advisory committee to guide the Port of San Francisco's development of the Pier 52 Public Boat Launching Facility. The basic components of this project are a launching ramp, a cafe with bait and tackle shop, public shoreline access, and a parking lot for trailers. This project has secured funding from the State Department of Boating and Waterways and the Port of San Francisco totaling almost 2 million dollars. This project has been approved by B.C.D.C., and they have amended their San Francisco Special Area Plan to accommodate it. This change has received federal concurrence from the office of Ocean and Coastal Resource Management. Also, the Port held a meeting for its tenants and PG&E to arrange for the undergrounding of utilities adjacent to the site. A set of plans for this project has already been produced by architects hired by the Port. There is no mention of this project in the D.E.I.R. (Jeffrey Brown)

There was NO study in the DEIR of the impact on existing and future users of restriping Terry Francois Blvd. (formerly China Basin Street) for four traffic lanes to accommodate ballpark dedicated parking ingress and egress (V.34). (Corinne W. Woods, Secretary, Bay View Boat Club)

Response

Terry A. Francois Boulevard. Terry A. Francois Boulevard provides access to and on-street parking for a number of businesses and waterfront recreational uses. The ballpark traffic routing plan described in the EIR identifies Terry A. Francois Boulevard as a possible route for providing access to the 5.000 space dedicated Giants ballpark parking area (EIR, p. V.14). Use of Terry A. Francois Boulevard for this purpose would serve to reduce the amount of ballpark traffic using Third Street between Mariposa Street and the Lefty O'Doul

bridge. Illinois Street is also described in the EIR as a potential additional access route to from dedicated parking lots.

The ballpark EIR traffic impact analysis, in Chapter IV, did not assume that Terry A. Francois Boulevard would be available for ballpark traffic. Ballpark traffic originating from the south would be assigned to use Third Street to access the parking lots, and impacts under such assignment are described throughout Chapter IV of the EIR. Since Terry A. Francois Boulevard could potentially become an alternate route to Third Street and would thereby relieve traffic on Third Street, one of the recommended mitigation measures described in Chapter V of the EIR (EIR, p. V.34) calls for Terry A. Francois Boulevard to be operated as a four-lane street before and after ballgames. This would involve the use of temporary pavement markings and or traffic cones to create three lanes northbound before games, with one southbound lane. After games there would be three lanes southbound and one lane northbound. This treatment may not be necessary for the entire length of Terry A. Francois Boulevard, as it is intended to organize the traffic flow in and out of the ballpark parking area. Similar operational practices are now used at 3Com Park.

Local, non-ballpark related traffic attempting to use Terry A. Francois Boulevard during this time is likely to experience some delay and inconvenience. This would be particularly true for local non-ballpark traffic traveling northbound before a game, and southbound after a game. The ballpark traffic routing plan before and after ballgames should include provisions for expediting local traffic movements. For example, before games, the three northbound lanes into the ballpark parking area need only extend long enough to accommodate the queue of cars waiting to pay their parking fee and enter the parking area. South of this point, ballpark traffic could be limited to the two center lanes. The northbound right lane and the southbound lane would then serve local traffic only.

The following paragraph has been added on p. V.18 after the second paragraph, to note the effect on Terry A. Francois Boulevard of the preliminary traffic routing plan proposal to use this street as additional access to dedicated ballpark parking lots:

The preliminary traffic routing plan calls for use of Terry A. Francois Boulevard as additional access to dedicated ballpark parking lots. This use would add traffic to this local street and could inconvenience and delay users of the boat launch ramp at Pier 52 and the restaurants, picnic area and fishing areas along this part of the waterfront.

In addition on p. V.34 the last sentence of the first full bullet item has been deleted and the following text added at the end:

...as well as to maintain access to waterfront land uses before and after ballgames.

At present, Terry A. Francois Boulevard has a very wide paved area. In some cases it is over 200 ft. wide. The accommodation of four traffic lanes, requiring 40 - 48 ft., would not be a problem. The Mission Bay Plan adopted in 1990 calls for Terry A. Francois Boulevard to be 44 ft. wide, providing for two permanent traffic lanes. This would not be consistent with the number of lanes needed for ballpark operations; however, it would be wide enough to allow four lanes on a temporary basis. Catellus Development Corporation has prepared a conceptual plan for the Mission Bay area south of the Channel. This plan calls for Terry A. Francois Boulevard to provide four permanent traffic lanes, which would be compatible with the traffic requirements of the ballpark.

The dedicated parking south of the Channel is within a 15-minute walk distance from the ballpark site. Therefore, shuttles suggested in one comment would not be necessary.

See Responses in the Transportation, Setting, for a discussion of Table X.C.2 and its appropriate contents.

Boat Launch Ramp at Pier 52 - Ballpark-related traffic operations may conflict with the operation of existing boat launching ramp located east of Terry A. Francois Boulevard near Mission Rock Street. Vehicles towing boat trailers need to maneuver into and out of the boat launching ramp and find parking in the area. The Port has developed plans for the launching ramp area to provide a formalized staging and turnaround area east of Terry A. Francois

Boulevard and a formalized area for boat trailer/vehicle parking immediately to the west of Terry A. Francois Boulevard. This plan is currently under review by the Port and by Catellus Development Corporation, and is subject to change. However, if it were implemented in its current configuration, it would be difficult for vehicles with boat trailers to travel between the parking area and the launching area during those times when ballpark traffic is queued along Terry A. Francois Boulevard. This conflict could be reduced by marking the pavement between the launching and parking areas with standard "Keep Clear" pavement markings, and a PCO could be stationed nearby to enforce the "Keep Clear" request. In the event queued traffic extends through this area, it would help to clarify to ballpark traffic that vehicles with boat trailers have the right-of-way through this area.

The first bullet item on p. V.34 has been expanded with the following sentence added as a new second sentence:

> **A "keep clear" pavement marking could be provided opposite the Pier 52 boat launching ramp to aid in use of this ramp before and after ball games. A PCO stationed nearby could enforce the keep clear request.**

Parking improvement measures that could assist non-ballgame users of the area, such as parking time limits or special parking passes, are described in the Parking, *South of Channel Area Parking*.

Pedestrians

Pedestrian Safety

Comment

We support the efforts to protect pedestrians and inform drivers of transit alternatives. However, additional considerations will be necessary when pedestrians are walking adjacent to buses and auto traffic without the buffer of parked cars. (Howard Strassner, Chair SF Group, Sierra Club)

Response

The closing of King and Third Streets next to the ballpark would eliminate heavy traffic on these streets so that pedestrians would not be affected by walking next to traffic without the buffer of parked cars. At other locations, onstreet parking is proposed to remain unchanged in the mitigation program described in the EIR. The PCOs assigned to control traffic would also assist pedestrian movements.

Pedestrian Facilities

Comment

IV.26 - Pedestrian Facilities: It is impossible to understand how many people are assumed to go in which gate for games or other events. Where does any queuing occur? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The pedestrian analysis generally assumed that before games, fans would enter the ballpark at the gate closest to the direction from which they walked. The exception was that pedestrians coming from the parking lots south of the Channel were distributed between the three entrance on the west and south sides of the ballpark. Queuing at the gates before games is not likely due to the dispersed nature of crowd arrival. After the games there would be some queuing inside the ballpark at the gates, however, there would be sufficient

gate capacity to allow a sellout crowd to exit in 12-15 minutes if desired. Typically fans would spread their departure over a longer period.

Pedestrian Effects on South Beach Park

Comments

Why haven't pedestrian impacts on the Park been studied in this document? With two of the four park entrances abutting the park, and with your studies showing the intersection of Second and King Streets at pedestrian capacity, it can be predicted that the park will be trampled by the flow of pedestrians.

Figure IV.E.10 Pedestrian Locations Approaching or Exceeding Capacity
This Figure seems inadequate. It shows no pedestrian impact on South Beach Park or the surrounding neighborhood. How will pedestrian flow affect the neighborhood, particularly after a night game? (San Francisco Tomorrow Waterfront Committee)

South Beach Park pedestrian impacts. Fans attending Giants' games exiting from the Second Street and promenade exits especially will stream through the park but not necessarily use it. Overflowing foot traffic from the sidewalks and the promenade will flow through this park. There is no mention of this in the EIR. Diagram 4E-10 is inadequate because it does not show where people will go or the pedestrian impacts on the park. (Andy Katz, San Francisco Tomorrow Waterfront Committee)

San Francisco Tomorrow is concerned that the EIR does not give enough attention to protecting the South Beach Park between the stadium and the boat harbor. This park, at present, is a beautiful open space serving the many residents of the area, visitors to the boat harbor, and people from all over the city. I often visit the area. It is wonderful how many people walk up and down the waterfront and spend time in the park and harbor area. I would like to see more attention given to mitigating the effects on the park and the changes proposed in connection with the stadium. There is no analysis of the heavy pedestrian impact on the park on game and special events day, no mention of the resulting turf damage and no mention of the litter that will be increased by the prevailing winds. (Jane Morrison)

[S]urrounding the park, the sidewalks are somewhat lacking. I would hope that members of this commission, both commissions, maybe take a walk around here, take a walk around the site, take a walk down here and see. We don't have sidewalks across the street from this park. We don't have money to put stripes on the road, let alone put sidewalks next to these buildings. (Jeffrey Leibovitz)

Response

The existing South Beach Park is bounded by two walkways that would provide access to the ballpark. On the bay side the Port Walk would provide pedestrian access and on the King Street side of the park the sidewalk on King Street would provide access. Both of these routes lead to what would be entrances or exits to the ballpark. There would not be a pedestrian entrance or exit along the east frontage of the ballpark adjacent to South Beach Park, and as a result there would be no reason for someone to cut through the park to reach an entrance or exit, unless they mistakenly went the wrong way.

The San Francisco Redevelopment Agency (SFRA) is considering expanding South Beach Park to about Second Street south of King Street. However, the design of this park expansion has not been finalized. Therefore no figure showing pedestrian use in the park can be provided. Consistent with the pedestrian circulation in the existing park area and with BCDC requirements, the SFRA would include appropriate paths and sidewalks on the perimeter of the park and accessing the park and may choose landscape treatments to keep pedestrians walking to and from The Embarcadero on the Port Walk or on King Street to prevent damage to any landscaping on event days as well as on non-event days. The existing park is designed in this way along much of its King Street frontage. Short-cutting through the park does not appear to be likely, since King Street and the Port Walk both provide direct access to The Embarcadero. If necessary, crowd control measures such as pedestrian barricades and traffic officers could be provided to direct the flow of the pedestrians and prevent damage to the park before and after major events. These steps could be implemented by the BTCC if game day experience indicates they are warranted.

See the comments and responses in Initial Study, Community Services, regarding litter issues.

Sidewalk Locations and Capacities

Comments

Public Safety: The sidewalks are not wide enough; people will be spilling into streets further adding to congestion and hazards. (Janet Carpinelli)

Are any pedestrian walkways planned? Any effort to route pedestrians out of the side streets? (Michael Karasik, Bayside Village Associates)

Looking at this document, we find it is woefully inadequate in addressing the pedestrian impact on the surrounding neighborhood. There is only one table, one diagram, outlining pedestrian flow. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Is there sufficient pedestrian capacity on logical routes that pedestrians would take walking to and from the convention, hotel, retail, and downtown office districts? (James Haas)

Pedestrian Impacts (p. IV.220) - CalTrain is concerned with pedestrian spillover into streets for 15-20 minutes after games in the area of 4th Street between Townsend and Sixth which will operate at LOS F for a weekday game. Impact on MMX/CalTrain transfer operations that may spill over into traffic lanes on King and 4th Street is another concern. A further concern is impact on safe and reliable MUNI bus operations on local streets surrounding the 4th/Townsend Station. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Figure IV.E.10. This graphic is not particularly helpful. There needs to be a map of the area immediately around the ballpark showing pedestrian circulation and problem areas. This scale is much too tiny for that. You have also omitted all of the mid-block alleys which people will inevitably use (a) because they may be faster than crowded sidewalks on the "main" streets, (b) they will have less traffic passing by and therefore be more pleasant, (c) people will want variety in the their walk, and (d) it is general human nature to resist being shoved into a limited number of routes. Are you assuming they don't exist or that they will have no pedestrians?

Additionally, there needs to be a map showing areas where there will be pedestrian/auto traffic conflicts, particularly around freeway ramps and queues -- or unusually narrow sidewalks...

...III.100 - Pedestrian network. The sidewalk system in this area is inadequately described Many of the streets, particularly side streets, have partial or inadequate, substandard sidewalks due to historic industrial nature of [the] area. Walking south from Market Street will be much more difficult than in other parts of the City because of: Rincon Hill/bridge "disjunction" of system; conflicts with heavy traffic, including traffic which is turning and congested; unpleasant nature of walking beside backed up traffic; as well as substandard

sidewalks. Much demand will be placed on 2nd Street and Embarcadero, and streets such as Beale, where, even if the road doesn't go through, pedestrians will walk. Please provide a graphic showing where there are sidewalks (or paths) and their width (include interior streets) for the area north of the ballpark at least to Harrison Street. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The capacity of pedestrian facilities, i.e., crosswalks and sidewalks, was analyzed on pp. IV.215 - IV.220 of the EIR and detailed results are shown in Table X.C.13 in Appendix C. As noted in the EIR text, sidewalks near the ballpark and leading to the dedicated parking lots would exceed capacity and pedestrians could walk in the streets. This would be a safety hazard. Mitigation measures for locations found to be over capacity are described on pp. V.54 - V.59 and on Table V.B.5. At congested sidewalk locations, the recommendations are to close King Street and Third Street so that pedestrians would not spill into the streets. The list of congested sidewalk conditions on p. IV.217 has been clarified to show congested conditions on Third Street between Lefty O'Doul Bridge and Fourth Street:

King Street - Second to Third Streets;
Third Street - Berry to Channel (east side);
Third Street - Berry to Channel (west side);
Third Street - Lefty O'Doul Bridge (east side);
Third Street - Lefty O'Doul Bridge (west side);
Third Street - Lefty O'Doul Bridge to Fourth Street (east side);
Third Street - Lefty O'Doul Bridge to Fourth Street (west side); and,
Third Street - King to Townsend Streets (east side).

The pedestrian analysis considered Third Street as well as Second Street and The Embarcadero as the primary pedestrian routes from the convention center, hotel, retail and office districts. While other routes might be used immediately South of Market, these streets are the only routes that extend continuously through to the ballpark. Fourth Street was also considered, but due to the conflicts with the I-80 freeway ramps on the west side of Fourth Street, most pedestrians would use the east side or shift over to Third Street before they reach the freeway. The capacity of each of these routes was analyzed and the problem areas and impacts are noted on pp. IV.217 - IV.220 of the EIR.

Pedestrian spillover would occur for the period 15 - 20 minutes after games at intersections on Fourth Street between Townsend and Sixteenth Streets, as noted on p. IV.220 of the EIR. This type of spillover could interfere with access to the CalTrain station and the transfer between CalTrain and the MUNI MMX during this limited time period. South of and including the Fourth and King Intersection the mitigation program as defined in Chapter V of the EIR includes the reservation of the Lefty O'Doul Bridge (Third Street bridge) for pedestrians. This measure would reduce substantially the pedestrian flows along King Street to Fourth Street and on the Peter Maloney (Fourth Street) Bridge. Also in the mitigation program in Chapter V, PCOs would be stationed at Fourth and King Streets and Townsend at King Streets to control pedestrian movements.

It is acknowledged that fans may use midblock alleys in addition to the major streets assumed in the EIR in the South of Market area; however, the EIR presents a worst case analysis of pedestrian impacts by not assuming that fans would disperse as the commentor suggests. An arbitrary assignment of pedestrians to various mid-block alleys could serve to minimize potential pedestrian effects; there is no basis for assigning pedestrians to one alley versus another for many mid-block streets. Factors such as time of day or night, the amount of pedestrian traffic on a particular sidewalk, perceived security and the amount of vehicular traffic all could alter one pedestrian's travel path. Figures III.A.1 and III.A.2 on pp. III.13 and III.14 do show the mid-block alleys in the vicinity of the ballpark, although in order to show this level of detail both maps show a smaller area than those in the transportation section. Table X.C.13, pp. A.128 - A.134, identifies the effective widths of the sidewalks and thus the unusually narrow sidewalks at the study locations.

Freeway ramps are located relatively far from the project site and they are not on streets that would be primary access streets for pedestrians coming from north of the ballpark: Second Street, Third Street and The Embarcadero. Between the site and the main parking lot and also between the site and the CalTrain station, where there would be the most pedestrians, there are no freeway ramps. Figure IV.E.9a has been added as a new p. IV.217a, it provides a map showing congested intersections and sidewalks where pedestrian auto

conflicts are likely. The figure is presented in these responses as Figure IV.E.9a and follows the first response under Pedestrian Corridors/Mapping. If a traffic routing plan is included in conditions of approval, it is likely to include PCOs, as described on pp. V.7 - V.11 and special pedestrian signal phasing has been recommended at Second and King Streets.

Pedestrian Modal Shift

Comments

IV.215 - Pedestrians. Do these figures take into account a possible shifting to more pedestrians if the Giants, or traffic congestion, is successful in getting more people out of their cars and onto transit (which will involve more people walking to their transit connection)? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

This [whether the analysis elements were considered interactively] takes on special significance, for example, if pre- and post-game pedestrian flows and Muni passenger queues were not integrated into Muni "[bus] bridge" shuttle traffic and auto congestion models. If combined, would there be a synergistic effect? Could these forecasts possibly be worse? (Silva B. Creg)

Response

The pedestrian analyses results assume all fans would need to walk to the ballpark entrances regardless of their travel mode. The main consideration is whether they are walking from a parking lot, a transit stop or their home or business. If efforts to get more people out of cars and into transit are successful, it is still assumed that the dedicated parking lot south of the Channel would fill first. The difference would be in the number of fans who walk to parking lots north of King Street versus walking to the bus stops for the various transit lines or the bus bridge. These walk routes to parking lots all use Second, Third, and Fourth Streets, just as the routes for pedestrians who use transit, except that the parking lots are farther away than the bus stops. Thus the scenario analyzed in the EIR is worst case in terms of impacts on sidewalks beyond a few blocks from the ballpark.

If transit use were to increase substantially over the level assumed in the EIR, fewer fans would walk to/from remote parking lots, and more would walk to the transit stops which are focused on King Street. As the mitigation program has made ample provisions for passenger loading and unloading on King Street, including the closure of King Street between Second and Third Streets, increased used of these transit stops would not pose a problem if this feature of the mitigation program is adopted as part of project approval.

Pedestrian Improvement Measures

Comments

V.58 - Pedestrian improvements Given the constrained sidewalks in much of the area, the substandard sidewalks and the volume of new pedestrians walking through this area, the level of mitigation is unacceptable. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page V.55. A new bridge is an alternative to improving the existing structure(s).

The suggestion for a third bridge across Mission Creek Channel should be discarded. The Channel is of vital ecological importance; such structure would produce irreversible environmental impacts. In addition, adding additional access for autos across the Channel would do nothing to reduce the congestion at the point of entry, i.e. the freeway off-ramps. (San Francisco Tomorrow Waterfront Committee)

Provide for dedicated access paths for local businesses and residents, force pedestrians to the Bay side of the Embarcadero and cars/buses out to the 3rd/4th Street loop... (Michael Karasik, Bayside Village Associates)

The pedestrian aspect of the EIR is not adequately dealt with, 12 percent of the attendees are supposed to be pedestrians who walk there, and there is no plan for pedestrian movement... (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

Pedestrian impacts in the surrounding neighborhood and beyond were given serious consideration in the analysis for this EIR. The study locations for pedestrian impacts are shown in Figure X.C.2 of Appendix C. Mitigation measures for pedestrian impacts are

described on pp V.54 - V.58. In addition, the street closures described on pp. V.9 and V.10, if implemented, would improve pedestrian safety and prevent jammed pedestrian conditions on the adjacent sidewalks. Additional recommendations to further improve pedestrian flow are described on pp. IV.223 and IV.224.

It would be difficult to force fans to walk a given route, such as the bay side of The Embarcadero as compared to the east side. However, as the bay side walkway is wider, and is not interrupted by traffic signals, most pedestrians would find it more convenient and pleasurable than the east side sidewalks. It would also be difficult to separate fans from other pedestrians in the area. The Ballpark Transportation Coordinating Committee could consider including pedestrian guide signs directing pedestrians toward the ballpark and away from neighborhood and park areas (see Transportation Mitigation, *Ballpark Transportation Coordinating Committee* responses).

The three options for a new bridge described on p. V.55 of the EIR included a pedestrian bridge option, and two auto bridge options; only a pedestrian bridge would be needed to serve the project. The EIR concludes on p. V.57 that a new pedestrian bridge is not needed if the Lefty O'Doul Bridge is closed to traffic before and after games. Such a closure would have other benefits including reducing transit and pedestrian conflicts with autos on King Street. If the Lefty O'Doul Bridge is not closed, there would be a need for a pedestrian bridge over the Channel from the dedicated ballpark parking areas. A new bridge, whether auto or pedestrian, across the channel would have substantial impacts on its own as described on pp. V.56 and V.57.

Second Street Sidewalk Width

Comments

Page IV.223, Sidewalk widths: On page III.101, it is noted the effective width of the Second Street sidewalks is as narrow as 3 feet in some locations north of Townsend Street. A mitigation measure, in addition to building new 20-foot sidewalks on Second Street between King and Townsend, is to remove obstructions on the sidewalks north of Townsend Street to

increase their effective width, since Second Street should be a major pedestrian route between downtown and the ballpark.

...Page V.58: The effective width of the Second Street sidewalks must be increased by removing obstacles or widening the sidewalks themselves. (Steven L. Vettel, Residential Properties Group)

Response

On Second Street between Townsend and Brannan Streets, the EIR states on p. III.101 that the effective width is as little as 3 ft. Removing and/or relocating the street furniture and obstructions on this block of Second Street to increase the sidewalk's effective width could be considered by the Ballpark Transportation Coordinating Committee as noted in responses in Transportation Mitigation under *Ballpark Transportation Coordinating Committee.*

Arcade/King Street Sidewalk

Comment

Page IV.220, King Street sidewalk: Since it is proposed that King Street be closed to all vehicles northbound between Third and Second Streets before and after games, the effective width of the sidewalk is much greater than 25 feet. Is the arcade necessary with this street closure? (Steven L. Vettel, Residential Properties Group)

Response

It is acknowledged that with the closure of King Street, the effective width would be wider than the sidewalk alone. Under these conditions, the arcade would not be needed to provide sufficient sidewalk area. The design of the public sidewalk along King Street has changed since the initial pedestrian analysis. The arcade adds 13 ft. of width while the proposed street trees reduce the effective width. The effective width assumed in the EIR is narrower than currently proposed for the sidewalk and arcade together, and thus the EIR analysis can be considered a worst case condition, similar to that if the arcade were not included, as is being considered by the project sponsor. The street closure would add to the effective width, thus mitigating the pedestrian impacts.

It would be desirable for smaller ballpark events such as a lightly attended game, not to have to close King Street. Therefore, it is important that the design of the ballpark include as much effective sidewalk width along King Street and Third Street as is practical.

Pedestrian Impacts on MUNI Stops

Comment

How can up to 42,000 fans exit the proposed Pac Bell Park directly to street level sidewalks without flooding intersections, colliding with Muni queues, or disrupting "bridge" shuttle loading points? (Silva B. Creg)

Response

The 39,500 fans assumed to attend a sellout ballgame would exit the ballpark at four different points. Still, it is projected that they would flood the sidewalk immediately in front of the ballpark, necessitating the closure of King Street between Second and Third Streets. Many MUNI stops are located one to three blocks away; thus passenger queuing for these lines would not occur at the project site. Passenger queuing for the MUNI Metro, which is right at the project site, was addressed on pp. IV.191 - IV.194 and IV.221. A description of the passenger loading and unloading provisions for the Bus Bridge is provided on pp. V.52 - V.53 of the EIR.

East of Second and King Streets, pedestrian crowds are assumed to have been dispersed enough to the north on Second, east on the Port Walk or east on King Street so that jammed conditions on the sidewalks and crosswalks would not occur.

Pedestrian Impacts on Potrero Hill

Comments

I believe the majority of voters on Potrero Hill voted against Proposition B (which approved a privately funded stadium) not because they are against a new stadium or do not like baseball, but because they knew that it would be exceedingly difficult to build such a stadium in China Basin without severely affecting the neighborhoods surrounding this area and the

greater San Francisco area as well. A thorough reading of the Draft EIR has proven these fears to be well founded. Not only is Potrero Hill excluded, or mentioned with the intent of exclusion, in many key sections of the Draft EIR, but many of the conclusions drawn in the Draft EIR are clearly illogical and misguided. The most significant of these conclusions concern:...

- ...Pedestrian traffic patterns and routing.

...The Draft EIR's previously mentioned incorrect assumptions about traffic and parking patterns also lead its authors to falsely conclude that there will be no ballpark/concert related pedestrian traffic on Potrero Hill. The DEIR states in the Environmental Impacts sections of the report under *Pedestrians and Bicycles* that "person-trips were assigned to routes based on their primary travel mode. For example, all fans who drove to the ballpark were assigned to various paths in proportion to the parking space availability." Since the DEIR concludes that fans will not park on Potrero Hill, it has also assumed that [there] will be no pedestrian traffic on Potrero Hill and has made no recommendations concerning infrastructure improvements that would need to be made to safely accommodate large numbers of fans walking to the ballpark from this area (see page 17, Figure X.C.2). (Sarah Ames)

Response

According to the walk-times prepared by Robert L. Harrison and confirmed by field actual observation by the EIR transportation consultant, Wilbur Smith & Associates, Potrero Hill is a minimum 25- to 30-minute walk from the ballpark and most of the neighborhood is located beyond the 30-minute distance for the average walker. It is possible that some fans may still park there and walk to the ballpark, as would some residents of Potrero Hill. However, the numbers of pedestrians are projected to be fairly minor and no changes to the existing pedestrian infrastructure in the neighborhood would be needed. Major volumes of pedestrians are forecast south of the ballpark site beginning at the proposed dedicated ballpark parking lots, and the impacts on the sidewalks and crosswalks from these parking lots to the ballpark have been identified (see pp. IV.217 - IV.220). See also responses in Transportation, Parking, "Potrero Hill Area Parking."

Pedestrian Corridors/Mapping

Comments

Pedestrian impacts were not addressed or studied for the Mission Bay south area. (Corrine Woods, Bay View Boat Club, Mission Bay Citizens Advisory Committee)

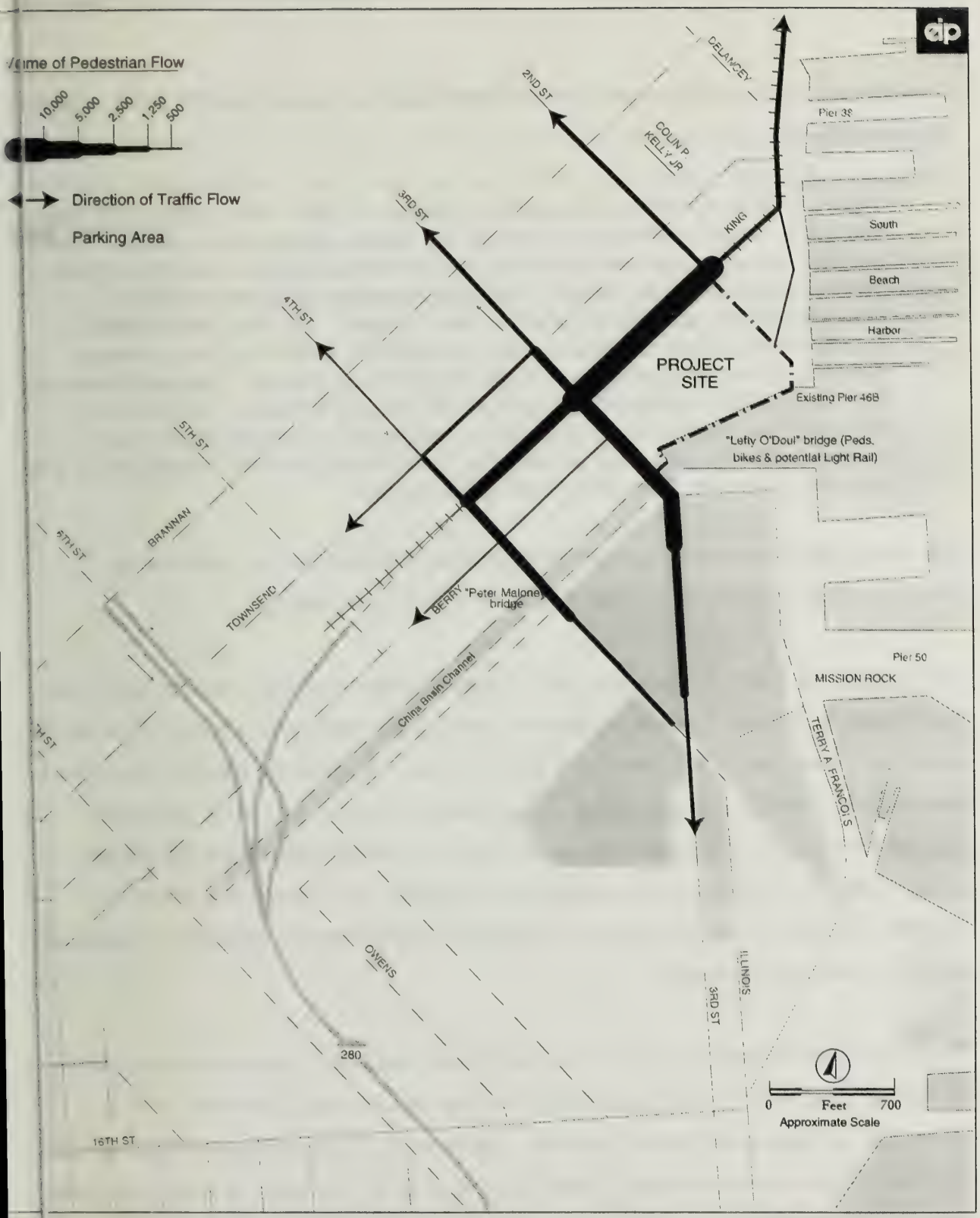
[Page] IV.22 - Increased Pedestrian Activity: The substandard sidewalks in South of Market are noted in my comments related to page III.100. Please add here as well. In addition to people walking on the sidewalks you should consider the impact of the "shopping cart" recyclers who exist in substantial numbers in this area already and are sure to be attracted by this ballpark. They take up much more space than a single pedestrian. In the area immediately surrounding the ballpark there are also likely to be street peddlers. There are people with card tables selling peanuts, baseball caps, sandwiches and all manner of things for about a 4 block radius along the main pedestrian approaches to Camden yards in Baltimore. Entrepreneurship will happen and it will take up space. It is very difficult to understand the pedestrian flow and the problems associated with it because of the lack of any graphic. Using the information in the Pedestrian Study described at IV.215 please provide a map of the relevant sidewalks with directional arrows of variable width showing the assumed pedestrian flow. It will give a much better idea of how many pedestrians will be walking down such streets as the Embarcadero, Second Street, King Street, 3rd Street, etc. and, when reviewed against the traffic flow map, may give a better idea of pedestrian conflicts with traffic and sidewalk capacity problems. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page IV.128, Figure IV.E.10 is not consistent with description on page IV.129. The sidewalk between Townsend and Brannan is identified as approaching or over capacity, and the crosswalk at Third and Folsom is also identified as a problem crosswalk but not shown on Figure IV.E.10. (Rincon Point South Beach CAC)

Pedestrian corridors / routes are not defined nor mapped. There is no plan for pedestrian movement, except in the immediate vicinity of the ballpark. There should be a broader pedestrian network plan, with impacts analyzed....What standards were used for pedestrian analysis? Were standards from Denver used? (James Haas)

Response

The primary impact of the ballpark and fans in the Mission Bay south area is in the proposed parking lots. Beyond this area, the numbers of pedestrians would decrease dramatically. A new figure has been added to the EIR Figure IV.E.9a, as p. IV.217a, to show the pedestrian circulation through this area and is presented on the next page.



SOURCE: Wilbur Smith Associates

GIANTS BALLPARK

Figure IV.E.9a (New) Pedestrian Circulation (Post-Game)

The following text has been inserted after the first partial paragraph on p. IV.217 to discuss this new figure:

> **Figure IV.E.9a illustrates the pattern of pedestrian flows that would occur after a ball game, which would be the most intense period of pedestrian activity. The greatest volumes would occur on King Street between Second and Third Streets in front of the ballpark and on Third Street between King Street and the dedicated Giants parking lots south of the Channel. The flows would disperse rapidly with each block distance from the ballpark with King Street between Third and Fourth Streets, Second and Third Streets between King and Brannan Streets, and The Embarcadero carrying the greatest volumes. Fourth Street between King Street and the dedicated parking lots would also experience substantial flows, primarily because the Third Street sidewalks would not be wide enough for all pedestrian flow to the parking lots.**

The widths and effective widths of the sidewalk study locations and the widths of the crosswalk study locations are presented in Table X.C.6 in Appendix C.

The potential for sidewalk vendors to set up business on key pedestrian routes to and from the ballpark is difficult to assess, although it appears likely that it would occur. Such activity would not impact pedestrian capacities if it were located outside of the effective flow areas of the available sidewalks. Without some sort of control, however, it is likely that some vendors would locate in a manner that could impede pedestrian flow. Until the ballpark opens, it would be difficult to determine if street vendors would represent a substantial problem. This is the type of issue that the Ballpark Transportation Coordinating Committee would be well suited to handle.

Figure IV.E.10 incorrectly omits the crosswalk on the eastside of the intersection at Folsom Street and Third Street which would be approaching capacity with a flow rate of 17.4 pedestrians per minute per foot of sidewalk. Figure IV.E.10 has been amended for the FEIR to reflect this as an open rectangle. The discussion on p. IV.219 refers to other "congested" sidewalk locations that have restricted effective width. Although recommendations were made for improving these locations on p. IV.223, these locations do not meet the technical definition of "Congested" that means approaching capacity and that is defined as a significant

impact. These sidewalk locations should not appear on Figure IV.E.10, as the commentor suggests, because the LOS at these locations is technically "crowded" not "congested." The following revision has been made in the text on p. IV.219, in the first sentence of the first full paragraph:

> **Conditions would be ~~congested~~ crowded at several other sidewalk locations in the study area.**

Parking

General Parking Issues

Comments

Surveys went out to the affected neighborhood organizations. You have heard about those. But they totally ignore the 650 harbor tenants.

I requested a survey to be designed to gather information so that there could be an understanding of harbor life, how often do you use your boat, what time of day, how many hours do you spend on your boat, how many nights do you spend on your boat, what days of the week do you use your boat. None of these things were done. (L. Joseph Boss)

The CAC sent out surveys to the affected neighborhood organizations, but again, ignored the 650 harbor tenants. I requested a survey be designed to gather the information needed to gain an understanding of harbor life. How often do you use your boat, what times do you arrive and depart, how many hours and nights do you spend on your boat in the harbor? This was not done. (L. Joseph Boss)

Response

The comment is acknowledged. The person commenting is referring to a survey that was sponsored by the Rincon Point-South Beach Citizens' Advisory Committee (CAC). Over 4,000 surveys were distributed area neighborhood groups, other CAC's and residential and commercial owners that would be directly affected by the ballpark. Apparently, the survey did not address potential issues of South Beach Marina tenants. The EIR preparers were not responsible for the scope, design or distribution of the CAC survey and, therefore, cannot respond to the comment. The analysis of parking supply and project parking demand was not based on surveys but on field data standard transportation analysis methods. The survey results are summarized in the EIR on p. III.99.

Comment

2. Parking - The Stadium appears to be under parked by 2,600 spaces. Further there does not seem to be a long term commitment for the 5,000 car lot south of the Lefty O'Doul Bridge. When this parking is lost the problem will become more difficult. (H. James Schafer)

Response

During sold out weekday afternoon games or special events of a similar size, there could be a parking deficit of about 2,600 spaces within the parking study area defined as a 15-minute walk distance from the ballpark for sellout events. However, an additional 3,080 off-street, public parking spaces could be available outside of the study area, within a 15- to slightly over a 20-minute walk distance from the ballpark site (see discussion on pp. IV.206 - IV.208 of the EIR.) The EIR also evaluates an "Increased Dedicated Parking Variant" in which a total of 6,800 parking spaces would be provided, 1,800 spaces more than are currently proposed, and a "No Dedicated Parking" Variant (see pp. VII.9 - VII.25).

The following sentence is added as the last sentence in the first paragraph on p. IV.201:

> **The parking short falls and surplus analysis results would be similar for a non-baseball event of a similar size.**

The ballpark project proposes to provide at least 5,000 dedicated parking spaces south of the Lefty O'Doul Bridge which crosses China Basin Channel. Catellus Development Corporation and the Port of San Francisco are currently negotiating the exact location of the interim parking lots. Due to the planned development of Mission Bay by Catellus (north and south of the Channel) and the future development needs of the Port, a specific long-term parking plan has not been developed for the ballpark. Parking is planned on an interim basis, partly to measure the level of demand for parking based on actual use of the dedicated parking facilities (see p. IV.201 of the EIR). The EIR assumed that interim parking would be replaced with structured parking for the ballpark somewhere near China Basin Channel by the year 2015 to address long term parking needs.

Comments

Parking is currently in short supply during the day in the SOMA. I don't see how this is going to improve with ballgames and concerts. Even on weekend nights parking several blocks away from the proposed ballpark site can be tight due to a variety of nightclubs that operate in the area. This will only worsen as the area continues to develop as a neighborhood and more and more people live there and new businesses locate there. I don't believe there will be as many street parking spaces as you suggest. (Arthur L. Meader, III)

p. III.98 Parking: Weekday Evening Please clarify "evening", 5:00-6:00-7:00 PM? (Jeffrey Leibovitz)

Response

The parking study area is located in the South of Market area (SOMA). The EIR reports parking shortages in the study area in the Parking Utilization/Availability analysis on pp. III.97 - III.99. During weekday afternoons, on-street parking is about 90 percent occupied. Parking occupancy on Saturday afternoons is quite similar to weekday afternoons. The EIR reports weekday evening parking conditions between 6:30 and 8:30 p.m. as weekday night games typically begin at 7:35 p.m. As stated in the second paragraph on p. III.96, this analysis time period accounts for peak evening occupancy when residents would have already returned home and parked for the evening. During this period on-street parking is about 60 percent occupied.

Nightclub parking would occur later in the evening than was analyzed in the EIR for both weekday and Saturday conditions. However, the EIR does consider the impact of future development in SOMA by accounting for new development that would reduce the supply of existing parking (see discussion on p. IV.205 regarding Removal of Parking Due to Currently Planned and Future Development and Table X.C.12 on p. A.127 of the EIR). The parking demand generated by future development cannot be assessed as the types and locations of these uses and the amount of on-site parking they may include are unknown. The methodology for determining the parking supply is described in detail in the San Francisco Giants Ballpark at China Basin Background Transportation Report, March 17, 1997, p. 2-18 - 2-20. Without a specific comment on the adequacy of the parking inventory and methodology, no response can be made to the comment regarding the number of on-street spaces.

Comment

Can we assume that all of the disabled parking spaces required for this project will be located in this parking lot [on the ballpark site]? How many disabled spaces will be provided on site? How many are currently located at 3Com Park? (San Francisco Tomorrow Waterfront Committee)

Response

Section 155 of the City Planning Code requires that one disabled parking space be provided for each 25 off-street parking spaces. Assuming the ballpark provides at least 5,000 off-street spaces, approximately 200 spaces disabled parking spaces would be required for the stadium. It is not clear that these requirements would apply, based on the provisions of Proposition B; however the project be required to meet accessibility requirements of the Americans with Disabilities Act (ADA) with respect to numbers of parking spaces for the disabled. Parking for disabled persons is planned to be located in the dedicated parking lot south of the Channel with paratransit providing direct access to the ballpark. 3Com Park currently provides about 135 disabled parking spaces out of a total of 8,400 spaces in the main parking lot.

Comments

The 5000-car lot proposed for south of the Channel exceeds the parking required by the Planning Code, and so is in conflict with the city's transit first policy. Surely, with the cumulative congestion forecast in this document, the focus of all parties should be to reduce the incentive to bring cars into the area. To that end, we would urge that the maximum number of parking spaces allowed on the lots South of the Channel be set at 2500, the number recommended in the Planning Code, and that this number be reviewed annually for downward revision. (San Francisco Tomorrow Waterfront Committee)

I remember very distinctly that during the campaign that the question of putting parking, 5,000 [spaces] or so was something that the Giants spoke to. It was certainly something I anticipated and was aware of when I voted. I can't imagine approval of a program like the stadium --although it is very transportation friendly -- without the kind of 5,000 [space] parking lot [for the] stadium that has been proposed. (Bill Wigert)

Response

As stated on p. IV.201 of the EIR, under Proposition B the project is not subject to the parking requirements of the City Planning Code. Proposition B created the Northeast China Basin Special Use District which accommodates the construction of an up to 45,000-seat capacity, open-air ballpark with related commercial uses. Proposition B amended the Planning Code to authorize the ballpark and related uses as a conditional use, and specifically provided that there is no minimum parking requirements for such a use.

Page IV.215 of the EIR describes a recommendation for a parking monitoring program that could be implemented during the ballpark's initial five years of operation. One of the purposes of this program would be to monitor and adjust the number of dedicated parking spaces each year, including a reduction in the number of spaces if appropriate. The Ballpark Transportation Coordinating Committee, described as a mitigation measure on p. V.4 of the EIR, could also be responsible for monitoring parking use at the ballpark and recommending adjustments to the number of spaces provided each year.

Comment

Transportation, Traffic and Pedestrian Flow - While these were analyzed extensively as related to ballpark operations, particularly traffic and transportation, pedestrian flow is dealt with more superficially once you get more than a block from the ballpark. However, the access, transportation, traffic and parking effects, impacts and needs of adjacent residents, businesses and yacht harbor is practically ignored. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Response

The EIR addresses parking impacts South Beach residents based on a survey of five residential developments in the South Beach area. Parking impacts on Potrero Hill residents are also discussed (see pp. IV.212 - IV.214). Refer also to the Response to Comments in the "*Potrero Hill Area Parking*" subsection of this document, below.

Comment

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: ...[a]dequate parking for meetings/special events. (Ship Clerks' Association, Local 34, ILWU)

Response

To the extent that the Ship Clerks Association holds meetings or special events during ball games or other events in the ballpark, there would be parking shortages in the immediate vicinity of the ballpark. The Redevelopment Agency could include special arrangements for use of the new parking proposed adjacent to the ballpark and intended for use by South

Beach Marina tenants and guests. During construction of the ballpark the Agency plans to install a temporary driveway to maintain access to the existing Marina parking area.

Comment

Page IV.208, Parking surplus: On weekend afternoons, "Giants fans could fill over 95% of the 5,920 unoccupied parking spaces within the study area." What impact would this occupancy rate have on area businesses, residents and non-ballpark visitors?

Page IV.212, South Beach parking: South Beach residents are likely to demand a residential permit parking program in their neighborhood which would restrict non-resident parking to 1 or 2 hours, making it unavailable for ballpark patrons (see page IV.215). The parking analysis must be adjusted to take this into account.

Page IV.213, South Beach parking: It is inaccurate to state that each South Beach residential development provides at least one-to-one parking. The Redevelopment Plan has a *maximum* parking standard of one-to-one and not every development has the maximum. For example, Bayside Village has 862 units and only 760 parking spaces, and the proposed SRO at Beale and Bryant will have 216 units and only 45 parking spaces.

There must be a discussion of the impacts on South Beach businesses, such as restaurants, caused by the use of on-street parking by ballpark patrons. (Steven L. Vettel, Residential Properties Group)

Response

Parking facilities that are 95 percent occupied are at capacity. As stated on p. IV.208 of the EIR the ability to find parking would be constrained under these conditions. Business patrons, residents and non-ball park visitors would have to compete with Giants fans to locate a small number (about 2 percent) of spaces that are vacant, or will turnover and become available. This type of deliberate search typically increases parking search times, or requires parking at greater distances than are convenient. Assuming that similar businesses are located elsewhere in the vicinity, customers would tend to patronize those similar business which have convenient and available parking, or avoid or delay their shopping trip.

South Beach businesses that rely exclusively on-street parking would be especially affected by parking shortages because these spaces would be heavily sought by Giants patrons.

To address effects on businesses and residents in the parking study area, the Ballpark Transportation Coordinating Committee (see pp. V.4 - V.5 of the EIR) could consider including in the Transportation Management Plan use of programmable parking meters or establishment of residential parking permit programs in commercial, recreational and residential areas near the ballpark. See Transportation and Circulation, Mitigation responses, under *Ballpark Transportation Coordinating Committee.*

The parking occupancy analysis accounts for existing business patrons, residents and non-ballpark visitors who currently use parking in the study area. Implementation of a programmable meter and parking permit program would minimize parking impacts on residents and on short-term visitors or business patrons. These programs would increase the amount of long-term parking designated specifically for residents, and would deter non-residents seeking ballpark parking from using the available supply of residential parking in the South Beach neighborhood. Programmable parking meters would make on-street parking available to visitors and business patrons. Ballpark fans would be forced to seek parking in lots or garages or travel outside of the South Beach neighborhood for parking, or would have to find on-street parking elsewhere in the study area or at greater distances outside of the study.

The third sentence of the second full paragraph on p. IV.213 of the EIR has been replaced as follows:

> **Each of the developments provide some amount of on-site parking for residents. Two of the developments provide one parking space per unit, but the remaining three developments provide an average of about .9 spaces per unit. Most residents are required to pay for their parking.**

Parking Analysis Assumptions

Comment

Permanent Impact on Parking: Table X.C.5, titled "Parking Inventory Survey Comparisons" uses four divergent studies taken of the parking spaces available in the area. (DEIR A.106).

The "Final Reconciliation" of the four studies reaches a number which is in excess of all of the studies. It is on average approximately 800 spaces above the highest number concluded between the four studies. Moreover, the study closest in number to the "Final Reconciliation" is the least recent of the four studies included. Consequently, the number utilized each analyses regarding the permanent effect on parking in the area is incorrect. As such, the conclusion is flawed. (David P. Cincotta, representing China Basin Landing, Ltd.)

Response

Table X.C.5 lists a comparison of four different surveys that were conducted within the parking study area (within a 15-minute walk distance from the ballpark) and for the area immediately outside of the study area (within 15 to slightly over a 20-minute walk distance from the ballpark). Except for the survey conducted by Robert Harrison, *none* of the surveys included all of the 64 blocks located in the study area and the adjacent area. As a result, the inventory totals listed in Table X.C.5 cannot be directly compared. For example, the Planning Department survey covered 23 of the 32 blocks located in the parking study area, whereas the Korve survey covered 8 of the blocks and the Pittman & Hames survey covered 13 of the blocks in the study area. Therefore, it is logical that the final reconciliation is higher than the P&H, Korve and DCP surveys because these surveys *did not include all of the study area blocks*. Refer also to the *San Francisco Giants Ballpark at China Basin Background Transportation Report*, March 17, 1997, pp. 2-18 - 2-19 for a more detailed description of the comparison of parking surveys and the derivation of the final parking inventory numbers.

The following note has been added to Table X.C.5:

> **Note: These surveys covered different portions of the overall parking study area. Only the Harrison survey covered the entire study area. Therefore the survey totals are not directly comparable.**

The final reconciliation is closest in number to the Robert Harrison survey; it included all of the study blocks, was completed in November 1994, and is the second most recent survey that was conducted, not the least recent. The commenter states that the final reconciliation is "on average 800 spaces above the highest number concluded between the four studies." It is not clear how the

commentor derived the 800-space result. Regardless, the addition of 800 spaces to the inventory would not materially affect the parking analysis and conclusions. These spaces represent 8.7 percent of the total public and private spaces in the parking study area and 3.8 percent of the total spaces within a 20+ minute walk distance from the ballpark site.

Comments

Parking Available: Table X.C.12, "Parking Spaces to be Removed Due to Future Development" fatally misses parking spaces which are crucial to office uses in this area. The study does not include the development of the two parking lots which comprise "the China Basin Landing Commercial Center Public Parking Lot". The first lot is located on the block bounded by King, Berry, Third and Fourth Streets. It provides 521 spaces. The second lot provides a total 304 spaces between Townsend, King, Third and Fourth Streets. The total 825 spaces will be lost to the development of Mission Bay North by the Catellus Development Corp. Catellus intends to break ground on this site in the Spring of 1998. This impact is reasonably foreseeable and should be analyzed. Laurel Heights Improvement Ass'n v. Regents of University of California, (1988) 47 Cal.3d 376. The development of this site is not speculative nor uncertain. Atherton v. Board of Supervisors, (1983) 146 Cal. App.3d 346. The failure of the DEIR to consider this loss renders its conclusion regarding the permanent impact to parking inaccurate. (David P. Cincotta, representing China Basin Landing, Ltd.)

Page IV.205, Table X.C.12: Table X.C.12 in Appendix C does not indicate that any parking spaces were assumed to be removed as a result of Mission Bay North or Seawall Lot 330 development. Should they be? (Steven L. Vettel, Residential Properties Group)

Response

The EIR is accurate in reporting the reasonably foreseeable loss of parking in the China Basin Landing Commercial Center Public parking lot. The approximately 825 parking spaces provided in this public parking lot were not included in the baseline (Year 2000) parking inventory and, consequently, were not included in Table X.C.12, Parking Spaces to be Removed Due to Future Development. These spaces are located on Assessors Block 3795, bounded by King, Townsend, Third and Fourth Streets. At the time the parking inventory surveys were conducted, this block and adjoining blocks south of King Street were subject to foreseeable, near-term development which could occur before the Year 2000, when the ballpark would be open for operation. Therefore, these spaces were never included in the baseline parking inventory for the project. Refer also to the *San Francisco Giants*

Ballpark at China Basin Background Transportation Report, March 17, 1997 Figure 2.10, p. 2-21. That figure shows the blocks and inventory that were included in the parking analysis.

Seawall Lot 330 is located west of The Embarcadero opposite Piers 30 and 32. Although there have been several proposals for development of Seawall Lot 330 in the past, there are no known plans for development of this parcel at this time. The Port of San Francisco indicates that it has no plans in the foreseeable future to initiate a development planning process for Seawall Lot 330. Under the Waterfront Land Use Plan, the Port is required to work with the community to develop feasibility studies, prior to issuing a formal Request for Proposal for private development. Although Seawall Lot 330 could be developed by the Year 2015, according to the Port, such an assumption would be speculative.

Seawall Lot 330 contains approximately 525 public parking spaces and is located within a 10 - 15 minute walk distance from the ballpark site. In the Year 2015, the ballpark is projected to have a parking shortfall of 2,650 spaces on weekday afternoons and a shortfall of 30 spaces on weekend afternoons (see Table IV.E.39 on p. IV.210 of the EIR). Based on current parking occupancy, removal of Seawall Lot 330 from the future parking inventory would increase the weekday afternoon deficit by 80 spaces and the weekend afternoon deficit by 395 spaces. This increase in the parking deficit would not materially affect the conclusions of the EIR parking analysis.[8]

Comments

Page III.96, On-street parking: Of the 3,550 on-street parking spaces north of the Channel, how many are in the residential area east of Second Street? If a residential permit parking program and/or programmable meters are instituted in this area, these spaces will become unavailable for ballpark parking. The parking supply and demand analysis should be redone to reflect this.

Page III.98, On-street parking: Of the 1,600 on-street parking spaces available for weekday evening games, how many are in the residential area east of Second Street? If a residential permit parking program and/or programmable meters are instituted in this area, these spaces will become unavailable for ballpark parking.

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8. Diane Oshima, Port of San Francisco, telephone conversation with EIP Associates, June 3, 1997.

Page III.99, On-street parking: Of the 720 on-street parking spaces available for Saturday day games, how many are in the residential area east of Second Street? If a residential permit parking program and/or programmable meters are instituted in this area, these spaces will become unavailable for ballpark parking.

Page III.97, On-street parking: Of the 1,105 on-street parking spaces available for weekday day games, how many are in the residential area east of Second Street? If a residential permit parking program and/or programmable meters are instituted in this area, these spaces will become unavailable for ballpark parking. (Steven L. Vettel, Residential Properties Group)

Page III.99, South Beach Residential Parking. No figures are given for the actual number of on site parking spaces available within the five major development projects and their utilization. This information should be easy to get from building managers. Also, information should be provided on the actual number of on street parking spaces available to South Beach residents and businesses, the current utilization of those spaces, and their status i.e., metered, yellow zone, green zone etc. (Rincon Point South Beach CAC)

Response

Within the parking study area, there are approximately 785 *on-street* parking spaces in the residential area east of Second Street. Although this area is predominantly residential, it also contains commercial, retail and light industrial uses which use the available on-street spaces located in the area. Of the 1,600 total on-street spaces in the study area available for weekday evening games, about 440 spaces are available in the residential area east of Second Street. Of the 720 spaces available for Saturday games, approximately 380 spaces are available in the east-of-Second Street area. During weekday afternoon games there are about 720 on-street spaces available, not 1,105 as stated in the comment (see p. III.99 of the EIR, the first partial paragraph). Of these 720 on-street spaces, about 55 are available during weekday afternoon games in the residential area east of Second Street.

The five South Beach residential development projects contain a total of 1,604 parking spaces, distributed as shown below:

Development Name	Total Units	Total Spaces
Baycrest	288	288
Bayside Village	862	761
Portside	62	62
Steamboat Point	108	108
South Beach Marina	414	385
Total	**1,734**	**1,604**

On-street spaces are reported for metered, unrestricted and time limits of 1 or more hours.

As the commentor notes, if a residential parking permit and/or programmable meter program were implemented in the area, many of these spaces would be unavailable for ballpark parking. However, these parking improvement measures have not been approved for implementation by the City and cannot be considered as part of existing parking conditions in the EIR analysis. One of the purposes of the EIR parking analysis is to identify potential effects of the ballpark, and to identify improvements that could help minimize parking effects, such as residential parking permits and programmable meters.

Comment

Page IV.84, Mission Bay parking: It is inconsistent to assume that all non-dedicated parking will be north of the channel. At build-out, Mission Bay will have on-street and off-street parking similar to the land uses north of the channel. (Steven L. Vettel, Residential Properties Group)

Response

Currently the type and location of on-street and off-street parking that will be provided by new development in Mission Bay south of the Channel is unknown. It is likely that parking would be prohibited on Third Street to accommodate the right-of-way for the Third Street Light Rail project. Conceptual plans for Mission Bay development south of the Channel are currently in preparation. However, no detailed information was available at the time the Draft EIR was prepared, and no information about locations or availability of off-street

parking or of on-street parking was made available in preliminary land use plans for Mission Bay at the time these Responses were prepared. Therefore, no reasonable assumptions could be made regarding the amount and location of on-street and public and private off-street parking. In the absence of parking information south of the Channel, the EIR assumed a worst-case scenario in which all non-dedicated ballpark parking would be located north of the Channel.

Parking Study Area

Comments

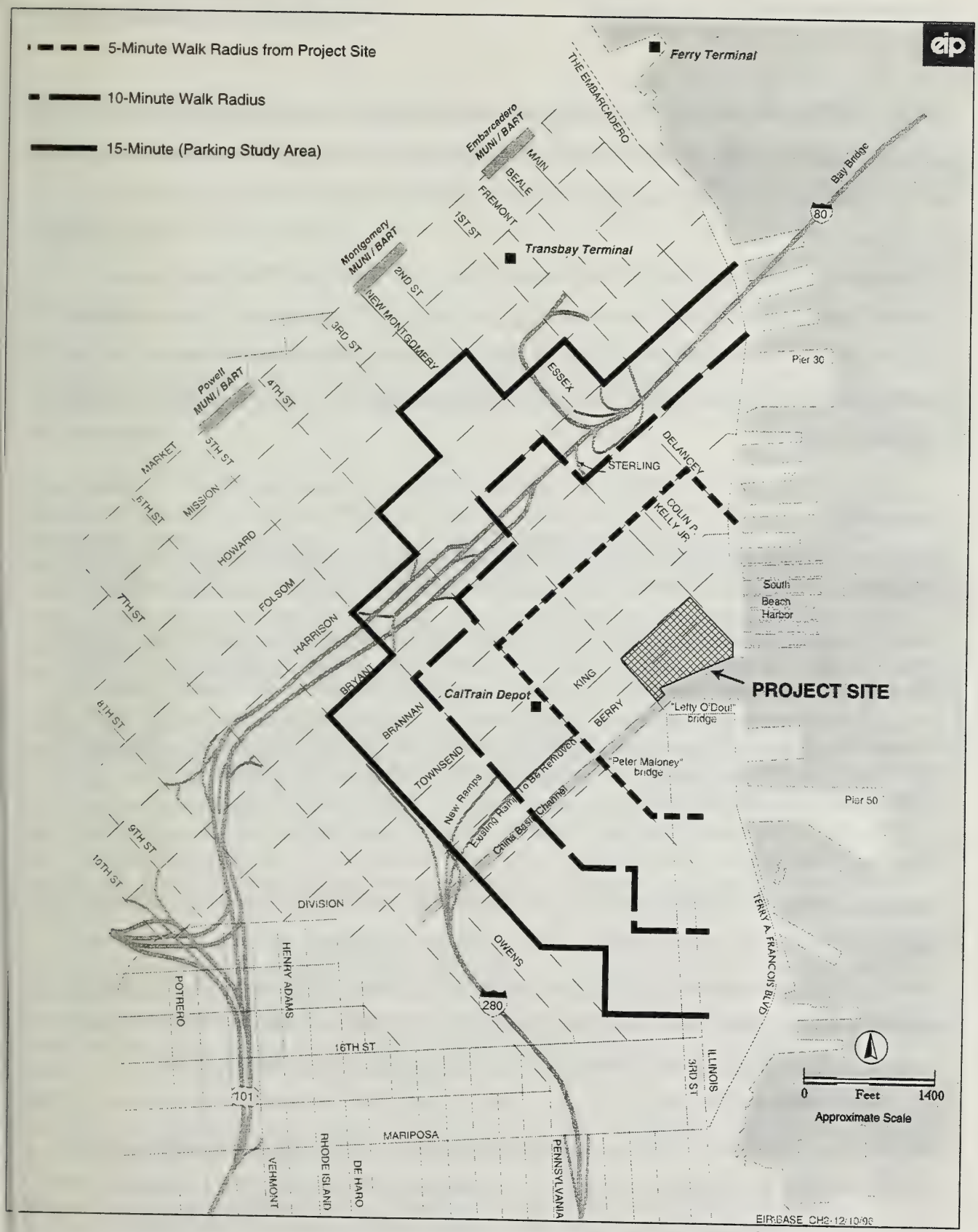
The 5 – 10 – 15 minute walking radius map should also include the area South of the Channel, and parking inventory in this area should also be included in supply / demand analysis. (James Haas)

III.63, Parking Study Area: The parking study area does not accurately define a 15 minute walk in all directions. There is extensive on and off-street parking available south of the channel. Excluding the area south of the channel minimizes the adverse impacts from both traffic and pedestrian trips from the south. This issue was raised in a letter of November 10th 1996 to Jim McCormack. Instead of correcting the problem it has been exacerbated. (See copy of June 17th 1996 proposed parking study area attached.) (Diane Nygaard)

Response

Most of the area South of the Channel that is not occupied by buildings and the golf driving range within a 15 minute walk distance would be occupied by the 5,000 spaces of dedicated ballpark parking. Therefore, potential impacts from both traffic and pedestrian trips have been included in the impact analysis, as most of these trips would be generated from the dedicated ballpark parking lots provided south of the channel.

Figure III.E.3 on p. III.64 of the EIR has been revised to include a 0-5, 5-10, and 10-15 minute walk distances south of the Channel (see figure on following page). As shown in the revised figure, most of the area within a 15 minute walk distance from the ballpark site is located on property owned by Catellus Development Corporation and the Port of San Francisco. As stated in the second paragraph on p. III.95 of the EIR, South-of-Channel on-



SOURCE: Wilbur Smith Associates

GIANTS BALLPARK

Figure III.E.3 (Revised) Parking Study Area

street and off-street parking within a 15 minute walk distance of the ballpark was not included in the parking inventory because it is expected to be eliminated over time by development of Mission Bay, and possible long-term bulk cargo expansion at the Port.

Furthermore, as discussed in the first paragraph on p. IV.208 of the EIR, there are no formally designated off-street, public parking lots within a 15 minute walk distance south of the Channel. Most off-street parking in the area occurs on unmarked lots and undesignated parking areas which cannot be included as part of a standard parking inventory of available spaces.

Comments

p. III.63 The assumption that Potrero Hill will not be used for ballpark parking is surely an over sight. Potrero Hill is easily a 15 min. walk to the baseball [site]. (Jeffrey Leibovitz)

The other issue is parking. I grew up in a college town. My family, whenever we went to football games, we always parked, like, 20, 25 minutes away from the stadium and walked. There was like a steady stream of thousands of people all walking to the football games. If you look at the map, the parking on Third Street is extended halfway down towards 16th. It is about ten minutes, at most, walk from my house to the edge of that parking. There is no way people are going to pay 10 to $15 to park when they have free parking in our neighborhood. (Peter Bouton)

Response

As shown in the revised Figure III.E.3, the Potrero Hill residential areas are outside of a 15 minute walk distance from the ballpark. For purposes of analysis, the walk time assumes a speed of 3.7 ft. per second (220 feet per minute or 2.5 miles per hour) which is typical for an adult's average pace. The walk time also accounts for the fact that in an urban setting, a person's walk pace would be interrupted to wait for signals at some intersections.

Although the topography within a 15 minute walk distance, north and south of the Channel, is fairly flat, the EIR preparers recognize, on page III.63 for example, that a 15 minute walk distance can vary depending on the person's physical condition and on whether fans are walking with groups of friends (groups may walk slower, as they talk, than individuals). Therefore, the walk distance was intended to represent an adult's moderate walk pace.

Furthermore, the EIR acknowledges that many people would be willing to walk farther depending on parking availability and costs. (See, for example, pp. IV.205 - IV.206.)

South Beach Harbor Area Parking

Comments

The lost parking for the marina clearly needs to be replaced because it is necessary that parking be available to haul sailing gear. The Agency has proposed one "solution" -- an underground garage which itself makes the expanded park less attractive by creating a 15 foot high mound.

As an alternative to that location, an alternative parking site at Pier 40 for the harbor along with all of the harbor related facilities currently proposed for the structures in the South Beach park should be analyzed. Parking in that location would be limited by the McAteer Petris Act to the harbor, rather than general parking. The traffic patterns would keep those using the harbor and the harbor facilities out of the ballpark traffic flow and make it easier to control traffic directly around the ballpark. It will also allow for much more generous open space and a more usable flat expanse of park. Finally, the shadows which would be cast by the park structures would be eliminated.

Shifting the traffic from the harbor away from the ballpark would itself be beneficial to the traffic problems encountered with this project. Among them, there would be reduced potential conflict between autos using the driveway [users of 242 spaces would disappear] and pedestrians walking to the ballpark -- the other users would to a great extent be players and others who would be driving in earlier. In addition, eliminating potential hotel use on Pier 40 would eliminate the need to include a cumulative development scenario which includes the traffic problems related to that site. (Sue C. Hestor, Advocates for South Beach Harbor)

I use my boat as a social item and also a racing item. I am very concerned about the amount of parking there is to get -- if we get to our harbor, that is one thing. But to park at the harbor is something completely different. I have a race boat that requires six to eight people to go out on a race. I have two permits. Hopefully, I will keep at least those two....But where do I ask my crew -- we are coming from all counties, across the bay, they can't take public transportation -- where do I tell them to park? There are four parking areas right now: the permit area, there is the area in front of the Great Sailing Ship, there is the Pier 40 area, and then there is the area in front of the Union Building.

What I've been told is that all four of these will no longer be there. They are going to provide 210 parking places in an underground area adjacent to the ballpark, but the other three areas will not be there. Where do I ask my crew, lugging all their foul weather gear

and boots and equipment, where do I tell them to park? There is no further parking anywhere. (Dave Davis)

Since I use my boat for both social reasons and also for racing on Saturdays and Sundays, I am very interested in directing my race crew to park within a reasonable walking distance to the boat. Currently they have been able to find a parking spot in front of the Sailing Ship, or in Pier 40, or in front of the Union building. Since I race with 6-8 crew, that means I require usually four to six parking spots. I have been told that these three areas will no longer be available for anyone. Will I be able to get additional permits for my crew so that they can get into the underground parking area? (David Davis)

Boaters are heavy laden when they go to boats. They are heavy laden when they leave the boats. They have got wet clothing they have to take home and dry off. It is a high impact sport out there with the water. So, public transportation does not work very well.

There is going to be a parking garage, but it is going to be right at the entrance to the ballpark, and if you can't get to the -- all the traffic is going to make it very difficult to get to that parking garage, so we are quite concerned with that also. (Dick Locke)

Impacts of shared access requirements off Second and King Streets by South Beach Harbor users and the 180 space Ballpark garage needs to be analyzed. Summer weekends are prime use times for boaters, which coincides with weekend day baseball games. (James Haas)

The parking studies in the traffic analysis do not deal with the fact that the harbor will recoup its lost parking if, but only if, the underground parking structure is built to presently planned dimensions. Additionally, guests of harbor tenants who presently use public parking near the harbor will be affected by the congestion. The lack of real parking availability has similarly doomed Pier 39 Marina to second class status. (Doug Gooding, CAC member)

The parking structure must be adequately protected and policed to ensure that the spaces designated for harbor use stay that way. Possible methods include on-site security, cardkey access, and towaway enforcement. (Doug Gooding, CAC member)

The environmental impacts on South Beach Harbor warrant specific attention. Impacts on this most immediate neighbor of the new ballpark have been seriously overlooked. The marina was treated as though it weren't even there. This reflects an inadequate understanding by DEIR authors of the marina's function and role as a recreation and open space resource... The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... Conflict between boat users and baseball events is not acknowledged nor addressed in light of direct conflict between highest harbor use and ballpark use – Friday evenings and weekends. Vehicle access, parking demand and utilization by waterfront users and boaters are not analyzed. (Martin Fay, Rincon Point – South Beach CAC)

Response

As described on p. III.29 of the EIR, the San Francisco Redevelopment Agency (SFRA) planned to reconfigure and extend South Beach Park and parking area, placing 210-250 parking spaces under a planted and landscaped earthen berm at the time the Draft EIR was prepared. Another option now under consideration includes a surface parking lot with no park extension (see response in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension, for further discussion). Whether the lot is subsurface or surface, the SFRA is currently in the process of designing the parking to share the Second Street entrance with the ballpark project's internal parking facility. The joint entrance would allow an increase in the number of parking spaces to be provided for the Marina. The Second Street entrance and access road would serve the 180 parking spaces for the ballpark and the loading dock area located under the centerfield bleachers. The project sponsor is also considering reducing the number of on-site parking spaces to 50 from 180; the entrance would remain as proposed and would continue to be shared with the SFRA parking.

Alternative locations for the SFRA South Beach Marina parking are not required to be analyzed in this EIR on the proposed Giants Ballpark at China Basin. The proposed parking has been included in the impacts analysis because it proposes a shared access driveway with the ballpark parking and because it would be an adjacent land use. If this parking were to be moved to Pier 40 as suggested in one comment, ballpark traffic might still cause access to be inconvenient for Marina uses but direct access conflicts with users of ballpark on-site parking would not occur.

Marina parking would need to be protected to prevent use by ballpark fans who would seek convenient, low cost parking. If shared-access parking for the Marina were provided as part of the ballpark's internal parking facility, then several improvements could be implemented to strictly reserve parking for Marina users during ball games. These include:

1. Install a revenue controlled gate system with card key access for authorized users of the Marina, and a fee collection system for the general public. During ballgames and events, Marina parking use would be strictly limited to card key holders and entrance gates could be set to prevent use by others.

2. Provide authorized Marina tenants with parking passes, which when displayed on the dashboard of the vehicles, would allow access to Marina parking on game days. Those without passes would not be allowed to use the marina parking during these times. This measure would require an attendant at the parking entrance.

3. If it is desired to allow other members of the general public to use the Marina parking on game days, establish a system to issues parking passes. For example, those with boats berthed in the Marina could be given passes to provide to their guests or crew.

4. Post signs indicating that Marina parking is strictly for Marina users and establish a fine for all other users. Tow-away enforcement by Parking Control Officers or on-site security would be required to make this approach effective. However, some abuse would be unavoidable.

The development of a parking control strategy for the South Beach Marina, which might include some or all of the measures described above, could also be one of the roles and responsibilities of the Ballpark Transportation Coordinating Committee, or could be established by the San Francisco Redevelopment Agency, in consultation with ballpark management staff.

Another important consideration would be the need to station Parking Control Officers, before and during games, at the King Street driveway entrance to the access road to the Marina and Giants parking areas. Otherwise, ballpark patrons would attempt to drive into this area to seek parking.

As stated on p. V.16 of the EIR, the preliminary traffic routing plan before and after baseball games calls for the closure of King Street between Second and Third Streets. The intersection of Second and King Streets would remain open under the control of parking control officers (PCOs). Access to the South Beach Marina and the ballpark parking and loading area would be possible via either Second Street or The Embarcadero/King Street. It is inevitable that vehicles entering or departing from the Marina parking area would experience delay and inconvenience, as there would be traffic congestion and delays on both The Embarcadero and Second Street (see pp. IV.135 - IV.171 for information on traffic congestion before and after ballgames or events). Also, persons unfamiliar with the traffic routing patterns before and after games would likely experience some unexpected inconvenience. For example, a person driving north on I-280, who would normally use the new ramps to King Street leading directly to the Marina, would be rerouted via Brannan or Townsend Streets to Second Street.

To describe existing parking in the South Beach Harbor Marina, the following text has been added to the Setting Chapter, p. III.99 of the EIR, before the discussion of *South Beach Residential Parking.*

> ***South Beach Harbor Marina***
>
> **There are two waterfront-related uses which depend upon existing off-street parking in the study area, north of China Basin Channel. The South Beach Marina is a 680-berth facility located south of Pier 40, which is within a 5-minute walk distance to the ballpark site. Currently marina tenants and their guests park at Pier 40 and other nearby off-street facilities. As discussed on p. III.29, the San Francisco Redevelopment Agency is considering development of 210-250 parking spaces, possibly under an earthen berm, to accommodate visitors to the harbor. This parking facility would share a common entrance to the ballpark parking under the left field and center field bleachers.**

To describe potential parking effects on the South Beach Harbor Marina, the following text has been added to the impact section of the EIR on p. IV.212 before the existing discussion of Parking Impacts on South Beach and Potrero Hill Residents.

South Beach Harbor Marina Parking

As discussed on p. III.29, the San Francisco Redevelopment Agency (SFRA) is considering reconfiguring and extending the South Beach Park and parking area, placing 210-250 parking spaces under an earthen berm (i.e., the park). The SFRA is currently in the process of designing the parking to share the Second Street entrance with the ballpark project's internal parking facility. The joint entrance would allow an increase in the number of parking spaces to be provided for the marina. The Second Street entrance and access road would serve the 180 parking spaces for the ballpark and the loading dock area located under the centerfield bleachers.

If parking for the marina is provided adjacent to the ballpark's internal parking facility, the current system of permit parking used adjacent to the Marina could be implemented to strictly reserve parking for marina users during ball games. During ball games, the Marina parking would need to be protected to prevent use by ballpark fans who would seek convenient, low cost parking.

Personnel could be stationed at the garage entrance, before and during games, at the King Street driveway entrance to the access road to the Marina and Giants parking areas if parking access were to be limited.

As stated on p. V.16, preliminary traffic routing plans before and after baseball games call for the closure of King Street between Second and Third Streets. The intersection of Second and King Streets would remain open under the control of parking control officers (PCOs). Access to the South Beach Harbor and the ballpark parking area would be possible via either Second Street or The Embarcadero/King Street. It is likely that people using the Marina parking area when entering or departing the garage would experience delays and inconvenience, as there would be traffic congestion on both The Embarcadero and Second Street.

Comment

I want to confirm, and it is my understanding that the Redevelopment Agency has an obligation under the California Department of Boating agreement which created the harbor to only put structures which do not -- I think the quote is "reduce the service capabilities for the boating public," me, "including parking facilities."

Now, the parking facilities are specified in that contract to include one-half parking space for every boat. In other words, one space for each boat. And then I think it would work out to be something along 300 and some odd spaces. That is not accounted for in the EIR -- draft EIR report.

I want to point out that boaters cannot take public transportation. More often than not we oftentimes must bring equipment and we must bring repair supplies, which we cannot take on public transportation.

I am willing to bring all of my crew in one car, and so far as they can fit, if one space is all I get. But I would prefer that we have as much parking available as possible because public transportation to the boat, even for people like me who live in the city, is simply not viable. (Kirk Kelsen)

Response

Regarding the commentor's statement on parking for South Beach Harbor, the California Department of Boating and Waterways requirement is the provision of one parking space for every two berths in use, which is 340 spaces for 680 occupied berths. Since the requirement depends on the actual number of berths in use, the Harbormaster determines the number of parking spaces that would be required on a day-to-day basis. The existing parking lot west of the Harbor has about 210 spaces, fewer than 30 of which would be removed to accommodate the Ballpark and the Agency's replacement vehicular driveway. As explained in Project Description, Service Driveway Access, the existing driveway to the parking lot on King Street opposite Second Street would also be removed to accommodate the Ballpark. The current arrangement to fulfill the Harbor parking requirement is to use the parking available on Pier 40 in the event there is a shortfall in the parking lot. This arrangement has been satisfactory because only rarely have all 680 berths been used at the same time.

As explained in Project Description, Service Driveway Access, the Agency has been exploring alternatives for the expansion of South Beach Park, including alternative configurations and locations for parking. All of the alternatives considered would increase the number of parking spaces from the 216 currently available. Also, as described in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, the Agency is considering the possibility of short-term rental of parking spaces to ballpark patrons when there is a night event at the ballpark. Before formulating any procedure for short-term parking space rental, the Agency would ascertain the usage of the parking lot by boaters and other regular users of the Harbor and Park and determine the

availability of parking. For those times when the Harbor demand for parking exceeds the number of striped parking spaces, the Agency may provide valet parking for Harbor uses.

South Beach Neighborhood Parking

Comments

As documented in the DEIR, the entire South Beach neighborhood south of Bryant Street is within an immediate, fifteen minute walking distance of the proposed ballpark. As such, this area provides perhaps the most immediately available potential source of public parking of any area in the ballpark vicinity. However, the parking resource which exists in this area is very much needed by the neighborhood, itself, and steps to insure that the neighborhood's parking is not impacted by the ballpark, are essential.

The DEIR suggests that generally, South Beach residents who rely upon on-street parking would in fact compete with Giants fans on game days (page IV.214). This seems to significantly understate the situation. Without effective parking controls, coupled with effective traffic control, the South Beach area will be inundated with ballpark traffic seeking the available parking spaces. Fortunately, there are a variety of methods for controlling parking within the area and assuring that it is available for residents of the area, and their guests. (Douglas G. Wright)

My biggest concern is parking. I need my car for work. I cannot afford $135./mo to park my car in my building's garage [in the South Beach neighborhood]. I am forced to leave my car on the street. Where will I or my visitors be able to park on game nights? (Ed Walsh)

The majority of the residential is on the east side of Second Street and south of the Bay Bridge. In that triangular area alone, there is well over half a billion dollars in residential properties there which--the quality of life there needs to be addressed.

As stated before, the DEIR did not address the neighborhood quality of life issues for a residential neighborhood which we believe need to be addressed and are mandated as such under Prop. M. Items such as...residential neighborhood parking needs...(Richard Dickerson, South Beach Marina Apartments)

SOUTH BEACH: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...lack of parking... that will accompany the new ballpark. (Janet Carpinelli)

Response

The EIR and transportation background analysis addresses the residential neighborhood parking needs of South Beach residents. A survey of South Beach 1,734 residential units

was conducted for the EIR analysis. The purpose of the survey was to identify potential impacts of the ballpark on residential parking in the South Beach neighborhood. Survey questions addressed existing parking conditions and concerns of South Beach residents. The survey was administered in cooperation with the building managers of Baycrest Condominiums, Bayside Village, Portside I, Steamboat Point, and South Beach Marina Apartments. Surveys were hand-delivered to residents' doorsteps; survey returns were voluntary. Only 294 or 17 percent of South Beach residents elected to fill out the survey and provide comments on ballpark parking issues. Page III.99 of the EIR describes the survey results, and pp. IV.212 - IV.214 describe parking impacts on South Beach residents as identified from the survey. (Also refer to the San Francisco Giants Ballpark at China Basin Background Transportation Report, Wilbur Smith Associates, March 14, 1997.)

Page IV.213 of the EIR points out that South Beach residents who rely upon on-street parking would be the most directly affected by overflow parking conditions from the ballpark. During weekday evening games, South Beach residents and their guests would compete with fans for available on-street spaces. Overall, residents and their guests might have to "circle the block several times" before they could find parking near their homes, or would be inconvenienced by parking farther from their home than they prefer.

See also responses in the Preferential Parking subsections of this document, below, concerning parking permit programs and/or programmable meters that could minimize ballpark parking effects on South Beach residents.

Also, see Transportation, Parking, *General Parking Issues* and *Parking Analysis Assumptions* regarding parking impacts in the South Beach residential area.

Potrero Hill Area Parking

Comments

With limited parking available near the ballpark and most of the fan base living to the south of the City, I fear my quiet, peaceful neighborhood is going to become a before and after

game raceway and a during game parking lot. My home is less than one mile from the stadium. (Andrea Laudate)

It is also inevitable that many fans will choose not to continue through the congestion on Mariposa and Third Streets to the designated parking lots near the stadium, but will instead park on Potrero Hill. Lower Potrero Hill is a ten minute walk to the designated parking lots and a twenty minute walk to the stadium which is less than a mile and a half away. Many Giants fans currently do not park in the half-full designated parking areas at 3Com Park, but instead choose to park for free in the nearby neighborhood of Little Hollywood...These fans park in Little Hollywood for free, have their tailgate parties and then walk the mile and a quarter distance to the stadium. Similar behavior may be expected of fans attending China Basin events and parking, unless discouraged, will certainly be a problem for Potrero Hill businesses and residents.

The DEIR does not acknowledge the "Little Hollywood issue," but instead states under the Environmental Impacts section of the DEIR that "the Potrero Hill area is beyond a 20-minute walk from the ballpark. As a result, any parking intrusion into this area by ballpark fans is likely to be minor, even during sellout games." In light of the Little Hollywood community's experiences with ballgame parking and taking into account the fact that Potrero Hill is on the side of the Channel that the designated parking is provided on, it seems clear that, contrary to the DEIR conclusions, fan parking will be a serious issue for the Potrero Hill community. (Sarah Ames)

With 65% of ballpark fans coming from south of the city, the downtown exits for both 101 and 280 will backup quickly, which will result in traffic exiting at Vermont (101) and Mariposa (280) exits. Since these two exits are one lane, feed onto residential streets, and unable to handle much traffic, cars will then begin exiting at Caesar Chavez. All of these exits will feed traffic onto Potrero Hill. Since, only limited parking is available near the ballpark, fans will park on Potrero Hill and these residential streets that are not designated for through traffic will become congested with traffic. Potrero Hill is only a mile from the Ballpark, and a 15-20 minute walk is very reasonable for the fans, who could save paying $10 or so for the limited parking closer to the ballpark, by parking on Potrero Hill for free. Also, 3rd Street will be closed for northbound traffic at Mariposa, thus diverting more traffic into Potrero Hill. (Jerry A. Peterson)

[T]here is a reference in the EIR...to parking as it might affect Potrero Hill. The statement is, "Therefore, it can be expected that relatively little parking would occur on Potrero by ballpark fans." And I'm saying, relative to what? (John Anderson)

Our area has become increasingly crowded with new business and residences, making traffic and parking difficult under normal circumstances. With the introduction of the Baseball Stadium, we are concerned that attendees of the events will severely clog our streets and parking areas. (Jerome M. Barulich)

Please note I am against turning Potrero Hill into Potrero Parking lot, and implore you to consider the effects that the increased volume of traffic will have on our neighborhood, and arrange alternate accommodations to protect the remaining quality of life for myself and my neighbors. (Jerome M. Barulich)

We fear that because of insufficient parking created for the park, visitors from the Peninsula will endeavor to park in our neighborhood; already, commuters use it (taking the train from the 22nd and Pennsylvania stop) and use many of our precious parking spaces: with the games, what is to prevent many more from coming, depriving us from the opportunity to park near our own homes? (Ward Schumaker)

Encroachment of parking in residential neighborhoods is a significant issue. I have photos of 3COM parking lots on game days that are less than 1/2 full, while the on street parking in Bayview and Little Hollywood is all taken up by fan parking. Fans will use free on-street parking at a significant distance from the park over adjacent paid parking lots. Fans approaching from the south will be able to access these free on street parking places prior to reaching the paid parking lots. (Diane Nygaard)

Response

As one commentor states, lower Potrero Hill is located within 10 minutes of the dedicated ballpark parking lots, but within 15 minutes of the ballpark stadium itself. However, the majority of Potrero Hill residences are located south of Mariposa Street, between U.S. 101 and I-280, an area which is a 25 to 30+ minute walk distance from the ballpark site. It is inevitable that some ballpark patrons would attempt to park in the Potrero Hill neighborhood, just as occurs in the Little Hollywood neighborhood near 3-Com Park. Since the South Bay, including the Peninsula, would have the highest percentage of non-San Francisco trip origins to the ballpark, it is also plausible that some of these people would elect to exit I-280 at the northbound I-280/Pennsylvania Street off-ramp, and seek parking in the Potrero Hill area. However, the *majority* of ballpark patrons would seek parking closer to the dedicated parking lots, within a 15 minute walk distance. This is especially true for night games and events, as fans may be deterred from walking through an industrial area at night to reach the Potrero Hill residential area.

While Potrero Hill residents would experience the inconvenience of cars circulating within their neighborhood to seek "free" parking, the number of fans doing so would be a small portion relative to the total number of ballpark parkers. As stated on p. IV.213 of the EIR,

Potrero Hill residents would be more likely to be affected by overflow parking from the ballpark if dedicated parking were not provided south of the China Basin Channel. (See also discussion in the No Dedicated Parking Variant, pp. VII.9 - VII.16.)

The Ballpark Transportation Coordinating Committee could consider including improvements such as residential parking permit programs, coupled with strict enforcement by Parking Control Officers during ballgames or events, to address Potrero Hill parking issues. See p. IV.215 in the EIR and Residential Parking - Residential Permit Parking Program response, below.

See also responses to comments in Transportation, Traffic Impacts, *Potrero Hill Area Traffic* and effects of traffic routing plans on Potrero Hill in responses under Transportation, Mitigation Measures, *Traffic Routing Plan.*

Comment

IV.208, Parking: Overflow parking will also occur on residential streets. (Diane Nygaard)

Response

The comment is acknowledged. The person commenting is referring to the first paragraph on p. IV.208 which discusses overflow parking south of China Basin Channel, beyond the dedicated ballpark parking lots that could be accessed during weekday afternoon events, when there is expected to be a parking space deficit. The last sentence in the first paragraph has been revised as follows:

> **Unless formal parking lots are developed, overflow parking ~~would~~ could occur illegally ~~or informally~~ on under used or vacant parcels, as well as encroach onto residential streets on Potrero Hill.**

Comments

(III.62 Paragraph 1) Fans will discover that it is only a 20 minute walk from Potrero Hill or Dogpatch to the stadium and will use street parking throughout this area. They will be able to catch the light rail proposed for Third Street to arrive at the stadium, meanwhile having taken up street parking on Potrero Hill, or in order to park in the proposed 5000 car garage

they will access it from the many side streets east and west of Third as well as Pennsylvania, Mariposa, 16th, 17th, etc.

(III.63) The Parking Study Area identifies an area within a 15 minute walk as Mission Bay Project area as being a reasonable walk for fans. Another 5 minutes added to that walk would include Potrero Hill and is not unreasonable to consider. The statement that the study assumes there will be no parking available in the Mission Bay Project Area except for the proposed 5000 car garage negates any meaningful output in this study.

(III E3) Again Potrero Hill is not included nor is Dogpatch. (Mariuccia Iaconi)

(III.95) Parking on Potrero Hill or Dogpatch, a 20 minute walk away from the proposed stadium, is not mentioned. (Mariuccia Iaconi)

It is practically ignored in the DEIR, Potrero Hill, and we are a 15 to 20 minute walk from the stadium site. I walked it myself in 24 minutes. Since nothing short of a no-cars-allowed will stop the traffic on game and event days to this stadium, Potrero Hill will be flooded with cars coming from the south, which most fans come from. Vermont, Mariposa, Pennsylvania and Third will be chaotic. (Mariuccia Iaconi, PLAN on Potrero Hill)

Table III.E.1 does not mention Potrero Hill. (My walk, from the stadium site to Pennsylvania and 18th Street took 24 minutes walking at the rate mentioned elsewhere in the report, and observing all traffic lights. Younger people will be able to do this in less time.)

(III.97/III.98) Both pages ignore Potrero Hill and Dogpatch. (Mariuccia Iaconi)

Response

As with fans who would park in the Potrero Hill neighborhood, it is also plausible that a portion of ballpark patrons would choose to park in Dogpatch or lower Potrero Hill and walk to ride the proposed Third Street light rail system to the ballpark. The proposed light rail project is scheduled to begin construction in 1999/2000 and begin operation in the year 2003, three years after the Giants Ballpark would open. Again, the proportion of total ballpark fans who would use this as a parking option is likely to be small in comparison to the total number of fans who would seek parking both north and south of the channel. Nonetheless, it is acknowledged that Potrero Hill residents could be inconvenienced by those fans who would encroach into the residential parking areas. Refer also to the response above.

The assumption that there would be no parking for the ballpark available in Mission Bay is reasonable, given the plans for future development of Mission Bay, north and south of the

China Basin Channel. This assumption is a worst-case, conservative analysis of parking availability for the ballpark by the year 2000. If more than the 5,000 dedicated spaces for the ballpark were to be provided in Mission Bay, potential parking effects on Potrero Hill would be decreased, as fans would have more available spaces south of the Channel.

From the ballpark site, 18th Street and Pennsylvania is within the 25-30 minute walk distance from the stadium site, including times to wait for signal crossings. As stated in the first response to Parking, *Parking Study Area*, it is acknowledged that a 15 minute walk distance can vary depending on the person's physical conditions, including age, height and weight.

The discussion on pp. III.97 - III.98 of the EIR addresses parking occupancy and utilization within the entire parking study area, and does not specifically call out any affected residential locations. Page III.99 discusses parking impacts of the South Beach area because this residential area is within the study area, defined as a 15 minute walk distance from the ballpark. As noted on p. IV.213 of the EIR, Potrero Hill area (including Dogpatch) is outside of the parking study area, beyond a 20 minute walk distance from the ballpark.

To address potential parking effects on Potrero Hill, the following text has been added to the setting section of the EIR on p. III.99 following the discussion of the *South Beach Residential Parking* regarding parking in the Potrero Hill area.

> ***Potrero Hill Area Parking***
>
> **The Potrero Hill residential area is located outside of the parking study area, within a 25 to 30 minute walk distance from the ballpark site. The Potrero Hill residential area is generally concentrated south of Mariposa Street, between U.S. 101 and I-280. This neighborhood has unrestricted residential parking.**

To address potential overflow parking in the Potrero Hill area, the following discussion changes and additions have been made to the EIR text on p. IV.212-213.

Change Subtitle "Parking Impacts on South Beach Residents and Potrero Hill Residents" to "**Parking Impacts on South Beach Residents.**"

Delete the second, third and fourth sentence of the first paragraph in this subsection, beginning with "The Potrero Hill area . . ."

Add the following new subsection to replace these deleted sentences:

Parking Impacts on Potrero Hill Residents

The Potrero Hill area (including Dogpatch) is within the 25 to 30 minute walk distance of the ballpark site. It is inevitable that a few ballpark patrons would attempt to park in the Potrero Hill neighborhood, although most would be deterred by the availability of closer parking than the longer walk back to their car after events. Since the South Bay, including the Peninsula, would have the highest percentage of non-San Francisco trip origins to the ballpark, it is also plausible that some of these people, would elect to exit I-280 at the northbound I-280/Pennsylvania Street off-ramp, and seek parking in the Potrero Hill area. However, the *majority* of ballpark patrons would seek closer parking in the dedicated ballpark parking lots, within a 15 minute walk distance.

While Potrero Hill residents would experience the inconvenience of some cars circulating within their neighborhood to seek "free" parking, the number of fans doing so would be a small portion relative to the total number of stadium parkers. There are a number of approaches to minimize overflow parking impacts on Potrero Hill residents; see the discussion of Other Mitigation Issues, beginning on p. V.45. Potrero Hill residents would be more likely to be affected by overflow parking from the ballpark if dedicated parking were not provided south of China Basin Channel. This possibility and its impacts are discussed in Chapter VII. Variants to the Proposed Project, pp. VII.9 - VII.16.

Parking Fees and Surcharges

Comments

The DEIR should be amended to show the estimated expected parking charge as proposed and include an estimate of the additional costs for each service provider. This should lead to an estimated TMF [Transit Mitigation Fee, suggested by the commentor] and resultant parking fees to cover all of the base additional transit and traffic mitigation costs. The DEIR should include the alternate number of parking spaces that might be provided when parking is

more costly, and an estimate of the new total number of cars which will be driven to the BP area. The TMF mitigation will also apply to the no dedicated parking variant and the DEIR should also include the above information for the variant. (Howard Strassner, Chair SF Group, Sierra Club)

Response

The fee that would be charged for ballpark parking is unknown at this time. The additional costs to transit providers attributable to the ballpark cannot be determined because these costs are interrelated to the level of fees that would be charged for ballpark parking. In other words, the level of parking fees or surcharges could increase or decrease transit ridership.

Establishing an appropriate surcharge is not a simple topic that can be addressed at the project planning level that EIR analysis must use, nor is it a physical environmental impact that would normally be included in an EIR. The elasticity of parking costs would determine how much additional fees ballpark fans would be willing to pay for parking before switching to alternative modes of travel or seeking less convenient (e.g., parking farther away), but cheaper or free parking. Funding a Traffic Mitigation Fee (TMF) in the form of a parking surcharge could, in effect, encourage ballpark patrons to encroach into residential and commercial parking areas that have free or unrestricted parking. A detailed econometric model of the relationship among parking costs and drivers' willingness to shift to transit or search for free neighborhood parking would need to be developed. Such a detailed analysis should be conducted if decision-makers choose to consider the feasibility of implementing a Traffic Mitigation Fee and parking surcharge.

South of Channel Area Parking

Comments

The main problem we see is this 5,000 to...6800 parking lot that would be along Terry Francois or China Basin. The impact of stadium traffic and a dedicated parking lot south of China Basin channel adjacent to the water front, even as a temporary use, has not been studied in the DEIR. That volume of traffic and the suggested mitigation measures would have a substantial adverse impact on the water-oriented recreation, public assembly, versus private use by stadium patrons, and maritime businesses and industries along the

Embarcadero, Terry Francois Boulevard and Illinois Street from Pier 30, 32 south to at least Pier 66.

Access to the only public boat launch in San Francisco, which is now being approved by the Port of San Francisco, would be impossible on at least half of the weekend days from April through September and on many weekdays. This ramp is used by fishermen, rowers, personal watercraft, trailered power and sail boats. Owners of small boats have no other place to go in San Francisco. This is across the street from this proposed 5,000 car parking lot.

Patrons... and guests of existing park and fishing rec areas, maritime businesses along the waterfront, such as boat and yacht clubs, boat yards, chandleries, boat storage facilities and sail lots which are all dependent on their waterfront location, would have great difficulty reaching these facilities. Any existing street parking would either be eliminated or taken up by ballpark patrons and would be very difficult for businesses with their own private parking facilities, such as restaurants, to retain these spaces for their patrons. We are talking about south of the channel still. (Randy Craig)

Provide permit parking on Terry Francois Blvd. for existing uses. (Jeffrey Brown)

The parking area study does not include anything south of Mission Creek channel and nothing in Mission Bay south...

The whole parking area south of the channel, and how it will impact the development of Mission Bay south, even though this is an interim use, was not addressed in the DEIR. I think it is quite important that it should be. (Corrine Woods, Bay View Boat Club, Mission Bay Citizens Advisory Committee)

Impact analysis for areas "South of the Channel" is covered very superficially. The maritime nature and impact on maritime uses South of the Channel is not addressed, particularly with respect to access, parking demand, and parking need by residents and waterfront users. (Martin Fay, Rincon Point - South Beach CAC)

Response

Terry A. Francois Boulevard provides access and on-street parking for a number of businesses and waterfront recreational uses. Page V.14 of the EIR identifies Terry A. Francois Boulevard as one of the access streets to the 5,000-space dedicated parking area. Use of Terry Francois would reduce the amount of ballpark traffic using Third Street between Mariposa Street and the Lefty O'Doul (Third Street) bridge. Local traffic attempting to use the boat launch ramp at Pier 52 or visit restaurants along Terry A. Francois Boulevard would experience delay and inconvenience on ballgame days. Responses

in the Traffic Impacts section above (in "South of Channel Area Traffic"), suggest means to help relieve congestion and provide access for local non-baseball traffic attending uses along the Bay shore in this South of Channel area. In particular, vehicles towing boats and using the proposed new boat/car parking area across Terry Francois from Pier 52 would be served best by a "keep clear" designation as described above in Traffic Impacts, "South of Channel Area Traffic."

Parking along Terry A. Francois Boulevard serves the recreational uses along the waterfront in this area. It is mostly informal, and is located on the broad paved areas that form part of the street. Therefore, it is difficult to determine the exact number of parking spaces available. Some of this parking is within a 15 to 20 minute walk distance of the ballpark. During ballgames it is likely that some ballpark patrons would take advantage of this relatively "close-in" free parking. The result would be that non-ballpark users of the waterfront area would have difficulty finding parking during this time period.

The following text has been added to the Setting Section, on p. III.99 immediately before the *South Beach Residential Parking* subsection to provide information about existing parking in the area near the shoreline uses south of China Basin Channel:

> ***South of Channel Parking***
>
> **A number of maritime recreational facilities, businesses and industries are located south of China Basin Channel, including a public boat launching facility at Pier 52, east of Terry A. Francois Boulevard. Parking along Terry A. Francois Boulevard is mostly informal, and is located on the broad paved areas that form part of the roadway. Therefore, it is difficult to determine the exact number of parking spaces available. Some of the parking along Terry A. Francois Boulevard is within a 15 to 20 minute walk distance of the ballpark site.**

To describe potential parking effects on the South of China Basin Channel waterfront area, the following text has been added to the Impacts section of the EIR on p. IV.212 after the new South Beach Harbor Parking section added as part of this Response to Comments

document, and before the discussion of Parking Impacts on South Beach and Potrero Hill Residents:

South of Channel Parking

Terry A. Francois Boulevard provides access and on-street parking for a number of businesses and waterfront recreational uses. As currently proposed, Terry A. Francois Boulevard would be one of the access streets to the 5,000-space dedicated parking area. Use of Terry Francois would reduce the amount of ballpark traffic using Third Street between Mariposa Street and the Lefty O'Doul bridge.

During ballgames it is likely that some ballpark patrons would take advantage of nearby free parking along Terry A. Francois Boulevard. The result would be that non-ballpark users of the waterfront area would have difficulty finding parking during this time period. Several measures which could minimize parking difficulties on maritime and recreational uses east of Terry Francois Boulevard are noted in Other Mitigation Issues, p. V.45, and in transportation mitigation measures discussed on p. V.34.

Improvement measures suggested by commentors to reduce inconvience to non-ballpark users in the South of Channel area could be considered by the Ballpark Transportation Coordinating Committee. This has been noted and discussed in Transportation Mitigation responses, under *Ballpark Transportation Coordinating Committee.*

Preferential Parking - Residential Permit Parking Program

Comments

Others have mentioned the desire to have a program in the neighborhood. We ask for that as well as programmable marking meters. (Steve Vettel, Bay Side Village Associates)

We have got to have some sort of permit parking that, I don't know, could somehow be enforced only on event days, you know. I don't know either -- I don't know what exactly now you would do that. I guess some sort of changeable signs that could have the list of the events up for the year, or something, that maybe the Giants could take care of the price of changing the signs. (Peter Bouton)

I would suggest zoning the South Beach Neighborhood for residential parking that would be strictly enforced on game nights. Currently, several of the alleys South of Market are "U"

Residential Parking Zoned. I would suggest expanding that to include all the streets here in the South Beach. I would also suggest enforcing meter parking on game nights. (Ed Walsh)

Obviously, the limiting of free on-street parking has a positive side benefit. It will encourage the use of public transportation and mitigate the concerns about traffic congestion in this neighborhood. We have more than our burden of that now! (Ed Walsh)

Examples [of mitigation measures] include...access preference for residence and visitors/patrons to the area. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Response

Pursuant to Ordinance 312-76 (adopted August 1976), the City of San Francisco has a residential permit parking program which allows the Board of Supervisors to designate certain areas of the City for restricted permit parking. Under this ordinance, Potrero Hill and South Beach residents could initiate a permit parking program in their neighborhoods to address their concerns about potential overflow parking from the ballpark. The program is targeted at areas where residents have difficulty parking due to outside commuter parking, locations near a business district, or the presence of a use which generates year-round, high automobile activity (i.e., a hospital). The permit program generally limits non-residents to two-hour parking in residential areas during weekdays. For example, South of Market has a Permit Parking "U" district which restricts non-residential parking to 2 hours between 8:00 a.m. and 9:00 p.m. Monday through Friday. Restricted parking locations in the district are targeted at residential pockets and alleys which are dispersed among businesses and commercial uses throughout the South of Market area. The "U" district was recently extended in March 1997 to include Harrison Street between Bryant and Brannan Streets in the South Beach area. The Department of Parking and Traffic (DPT) indicates that residents from the South Beach Marina and Bayside Village developments have made a number of inquiries regarding permit parking programs (Stanley Chin, Department of Parking and Traffic, personal communication, May 13, 1997).

In South Beach, DPT has been reluctant to issue permits near these developments because the total number of units far exceeds the supply of potentially available on-street parking. As a result, residents could be in the position of purchasing a permit for which no parking space

exists. In practice, DPT tries to issue permits in areas where the number of on-street parking spaces available are commensurate with the number of residential units. Potentially, DPT could issue a limited number of permits on a "first-come-first-serve" basis to a pool of residents that would equal the number of available parking spaces. However, not all residents would be able to pertain a permit.

The program has an ordinance-prescribed procedure for establishing a residential permit parking area, which includes the following steps:

1) The Department of Parking and Traffic (DPT) conducts a parking and traffic study for review by the public;

2) DPT holds neighborhood hearings regarding the study and the desirability of the parking permit designation and times;

3) DPT then recommends to the Board of Supervisors through the Parking and Traffic Commission the proposed area boundaries and whether a designation should occur, and, finally;

4) The Board of Supervisors holds further hearings to evaluate the recommendations of the Department of Parking and Traffic, including modifications to the area boundaries.

At a minimum, in order to initiate a permit parking program, residents of an area must determine a tentative area boundary, and submit a petition to DPT containing signatures from a minimum of 250 households or 50 percent of the households in the area proposed for permit parking. The annual fee per household for a permit is $21.00.

Permit parking programs usually target areas that have year-round parking difficulty, whereas a ballpark stadium would generate potential overflow parking on game days and when special events are held. Also, year-round permit parking that extends into evening

hours can be inconvenient for visitors and could negatively affect businesses, such as restaurants, that rely on the availability of on-street parking.

Other cities which have major downtown stadiums and arenas near residential areas have implemented residential parking programs to address these issues. The San Jose Arena is located west of Highway 87 and adjacent to downtown San Jose. This facility has approximately 17,000 seats and 1,800 parking spaces. The arena is located near several residential districts that contain single-family and multi-family housing. Residential units are located across the street from the arena with multi-story office buildings located east of Highway 87. Approximately 8,000 spaces are located in private lots which are primarily located east of Highway 87 and within a ten minute walk of the arena.

In response to neighborhood concerns about on-street parking in the vicinity of the arena, the City of San Jose has instituted a residential parking permit program.[9] Essentially neighborhood residents must have a parking permit on their vehicle to park in the area. The parking restriction is enforced 24 hours a day, seven days a week. Residents are given two guest parking permits for their visitors. In addition, the City established a two hour parking zone, enforced from 9 a.m. to 1 a.m., on a nearby neighborhood commercial street to discourage event parking, and encourage short-term business parking. At the request of the business owners, the commercial street does not have parking meters but instead has parking signs indicating parking restrictions.[10]

Oriole Park at Camden Yards is located in a mixed-use area that includes industrial and residential uses, and is within five blocks of downtown Baltimore. The baseball stadium has 47,000 seats and 5,000 parking spaces. Existing downtown parking facilities are well used by ballpark attendees, and typically charge from $5 - $10 per event. There are two residential neighborhoods with about 200 row houses each that are located within a quarter mile of the stadium, while the closest homes are across the street from Camden Yards.

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9. Jim Trodder, San Jose Parking Control, telephone conversation with EIP Associates, May 13, 1997.

10. Jim Trodder, San Jose Parking Control, telephone conversation with EIP Associates, May 13, 1997.

The City of Baltimore has residential permit parking programs in several neighborhoods, including areas around Camden Yards.[11] Typically, the permit program restricts parking in the neighborhoods to less than two hours for non-residents, between the hours of 9 a.m. and 6 p.m. For Oriole Park at Camden Yards, parking permit restrictions are extended from 6:00 p.m. in the evening to midnight, seven days a week, during the baseball season. Residential areas have signs which indicate that these restrictions are in effect from "April to October."

These types of permit restrictions could be applied to the Potrero Hill and South Beach residential areas. However, as one commentor states, advertisement of periodic special events would require posting signs in the permit parking area to indicate that non-residential parking restrictions would be in effect.

The EIR has been revised to replace the second parking improvement measure on p. IV.215 of the EIR with the following expanded measure:

Potrero Hill and South Beach Residential Areas

- **The South Beach and Potrero Hill areas should be monitored for parking intrusion during ballgames. Pursuant to Ordinance 312-76, the South Beach and Potrero Hill neighborhoods could initiate the implementation of a permit parking program in their respective neighborhoods. In developing the program, the Department of Parking and Traffic (DPT) should provide technical assistance to the neighborhoods to identify and address parking issues which are uniquely associated with the ballpark during the baseball season and periodic special events. These issues include the boundary locations; the location of different parking time limits within the permit area boundaries; parking time limits during game and non-game seasons; and a coordinated signage program. The technical assistance would also determine the feasibility of residential visitor passes on game days. Much of this information could be developed by DPT for the parking and traffic study required as part of the permit parking program procedures. In addition, DPT would need to address the feasibility of issuing a limited number of permits in the South Beach area,**

11. Paul Evans, City of Baltimore Planning Department; Frank Murphy, City of Baltimore Public Works Department, Traffic Engineering Division; and Robert Wheatley, City of Baltimore Parking Division, telephone conversations with EIP Associates, May 13, 1997.

because the number of residential units exceeds the supply of on-street parking available in this area.

As noted under Transportation Mitigation, *Ballpark Transportation Coordinating Committee,* Parking Control Officers, if included in a Transportation Management Plan, could enforce residential parking restrictions during ballgames or events at the ballpark as well as controlling traffic before and after games.

Refer also to *Preferential Parking - Programmable Meters,* below.

Comments

The DEIR incorrectly concludes that fan parking will not be a problem for the Potrero Hill area and then states that "the South Beach and Potrero Hill areas should be monitored for parking intrusions during games. Residential permit parking programs should be considered for these areas, if the monitoring shows a substantial level of parking intrusion."

Using past behavior as a predictor of future behavior it becomes clear that "parking intrusion" will be a problem for the Potrero Hill neighborhood. The DEIR should have addressed this issue and proposed a mitigation that would resolve it. Given this deficiency of the DEIR, I would like to suggest that a parking permit system be established for Potrero Hill which would include the following:

*A system which would specify free two hours parking in the neighborhood and which would only be enforced on event days.
*A system which would provide parking permits to all residents and business owners on the Hill free of charge. (Sarah Ames)

(III.96) Parking spaces available in residential areas present a serious problem to those who live in the area and depend on street parking for themselves and for friends. Proposals to use parking stickers for this area have been mentioned. The Giants should pay for stickers in this area in as much as they are creating the problem. (Mariuccia Iaconi)

I would ask the Planning Commission to mitigate this chaos by giving parking permits to the residents at Potrero Hill, and please do not have us pay for them, and please deny them to the ballpark fans, to deny ballpark fans the right to exit at these ramps that are the thoroughfares at the Potrero Hill neighborhood. (Sandra Peterson)

Response

Residential parking in Potrero Hill is currently free of charge and would remain so except for the annual fee for permit holders, with a residential permit parking program. Therefore, enforcement on game days of free two-hour parking would not provide any direct benefit to Potrero Hill residents if a permit parking program were to be implemented. Residential parking permits would not be available to baseball fans who do not live in the area. Currently, the Giants and the Department of Parking and Traffic are not considering the provision of parking permits to residents and owners free of charge.

Comment

Pages I.34 - I.36, Since the EIR generally analyzes "worst case" scenarios, it would be reasonable to assume that some sort of preferential parking program will be instituted for the South Beach area. The conclusion on page I.36, "South Beach residents who rely upon on-street parking would compete with Giants fans for available parking spaces on game days" is not a reasonable conclusion. Parking availability and demand analysis should be revised based on an assumption that a preferential parking and preferred access program will be instituted for South Beach residents and businesses. (Rincon Point South Beach CAC)

Response

The EIR parking availability and demand analysis evaluates worst-case effects of the project on *existing* conditions and identifies measures or improvements that could help mitigate potential effects. Presently, there is no preferential parking program in the South Beach or Potrero Hill neighborhoods and, as such, these programs cannot be considered as part of existing setting conditions in the EIR analysis. Instead, such programs are noted as means available to relieve the inconvenience caused by lack of resident- and business-serving parking on game and event days and as discussed above as possible improvement measures.

Preferential Parking - Parking Passes

Comment

3. The DEIR includes off-street parking resources within the South Beach neighborhood as part of the parking inventory (page III.96 and Table III.E.1). It may be that some number of these off-street parking spaces will be available for ballpark parking, although it is likely that this resource will diminish as the area continues to develop. In any event, given the need to

implement controls on ballpark traffic patterns in order to prohibit ballpark traffic from passing through the neighborhood, parking resources in the neighborhood should be subject to a prior reservation system.

The DEIR suggests that certain parking resources be subject to prior sell by the Giants, i.e., in conjunction with the purchase of (season) tickets. This approach should serve to diminish the uncertainty of locating a parking space and thereby reduce traffic congestion. This would certainly be the case with off-street parking spaces which might be available for Giants fans within the South Beach neighborhood. Prior sale of such spaces would mean that arriving fans could enter the neighborhood by presenting their parking pass to a PCO. In this manner, the available parking inventory would be used efficiently, lot operators would not feel compelled to litter the streets with signs and arrows, and the traffic restrictions imposed would be respected. (Douglas G. Wright)

Response

Page IV.205 of the EIR discusses the loss of existing parking due to future development, including in the South Beach area. Page V.43 of the EIR describes a transit incentive program which, among other incentives, suggests that parking charges be pre-paid at the time tickets are purchased. As the person commenting notes, prepaid parking would, in effect, "reserve" an existing space in a garage or lot; this approach could reduce traffic congestion by reducing queuing into parking lots and reducing the search time for available parking. It would, however, limit the amount of parking available for business patrons in the area if made available for daytime events or ballgames; during evening and weekend events fewer businesses would be open, and therefore fewer business patrons would be affected by providing pre-paid parking passes to existing garages and parking lots.

The comment implies that Parking Control Officers (PCOs) would be staged to restrict access of through traffic and ballpark traffic from entering the South Beach residential areas. This type of monitoring could be inconvenient and quite restrictive to residents and patrons of South Beach commercial establishments. If special parking passes for private garages and lots near the ballpark were to be made available, a program that notified fans that off-street parking in South Beach is restricted to only pre-paid, pass holders could achieve similar results without having residents, their visitors and commercial patrons stop and prove to PCOs that they were not fans seeking parking: (See Transportation Mitigation, *Ballpark Transportation Coordinating Committee*, for a discussion of pre-paid parking passes.) Of

course, PCOs who enforce parking and traffic restrictions could also inform people that no off-street parking is available in South Beach without prior purchase of a parking pass if this program were established. Fans could be informed of South Beach parking restrictions by coordinated signage, and as part of parking information materials prepared by the Giants.

Preferential Parking - Programmable Meters

Comments

Transportation mitigation does not acknowledge the E/F Line connection and extension. Concepts such as "programmable parking meters," preferential parking programs and "Ticket and Tow" enforcement programs are not mentioned as possible approaches for protecting small area serving business and parking for area residents and their guests. (James Haas)

...specific neighborhood traffic, parking and pedestrian amenity infrastructure improvements must be identified, as should be specific funding sources for those improvements. In Denver, for instance, a several block area around the ballpark is protected by programmable parking meters which run on game nights until 11:00 p.m. On event nights, those meters allow 1-2 hour only parking, thus preventing ballpark patrons from monopolizing the metered spaces. Cars parked at expired meters are liable to be ticketed multiple times, and are subject to being towed. The existence of programmable meters allows neighborhood businesses to continue to operate, allowing their customers to park to patronize their businesses without every area parking space being tied up by ballpark patrons. (Rick Mariano)

Establish no parking zones for ballgame or event attendees in the South Beach neighborhood, enforced via stickers. Implement event day meters which were used in Denver, which are programmable with a computer chip and allow for only 60 to 90 minute parking, whereby the game attendee would be ticketed with a stiff fine ($150) and ticketed repeatedly every 15 minutes, then towed. These would be within a 15 minute walk from the park. (Michael Karasik, Bayside Village Associates)

The specific area plan assumptions that...the DEIR must analyze must include a or other program in the Rincon Point South Beach, South Park, Mission Creek and other affected neighborhoods that ensures adequate parking for residents, businesses, patrons and guests, a strategy to protect access and patronage for small businesses by providing programmable parking meters. This is something we saw in Denver, and we recognize that it worked very effectively, and other programs to assure parking, loading and access for patrons and clients, while discouraging congestion and loss of parking caused by drivers to ballpark events... (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

Generally, permit parking programs are better deterrents to restrict parking in residential areas, whereas programmable meters are better incentives for business patrons in commercial areas. In mixed use areas, such as South Beach, a combination of both types of parking programs could be effective. As noted in Transportation Mitigation, *Ballpark Transportation Coordinating Committee,* the Ballpark Transportation Coordinating Committee could consider these and other suggestions from commentors in implementing a Transportation Management Plan for the ballpark.

Programmable meters have been successful in Denver at the Coors Field baseball stadium to address the parking needs of commercial businesses in the vicinity of the ballpark.[12] Coors Field is a 50,000 seat baseball stadium located in the Lower Downtown (LoDo) section of downtown Denver. The facility has approximately 5,000 - 6,000 parking spaces. In addition, there are 45,000 parking spaces within one-quarter mile of the stadium and 60,000 parking spaces in the downtown district. Parking costs during events are typically $5 - $8, although there are some $15 parking spaces located adjacent to Coors Field. The area has primarily commercial office, hotel and industrial uses, although residential loft development has taken off in the area during the past three years. A residential neighborhood to the northeast is separated from the field by an industrial district. The City has not made any pedestrian improvements (i.e. sidewalks, street lighting) in this industrial area to intentionally discourage parking.

Programmable parking meters were installed for on-street parking spaces in the vicinity of Coors Field. Denver uses the Duncan Eagle model which cost approximately $385 per meter, excluding installation, re-programming and maintenance costs. For comparison, a typical non-programmable meter in San Francisco costs about $250.[13]

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12. C.J. Mussman, Department of Public Works, Parking Management Division; and Bob Dorroh, Department of Public Works, Transportation Engineering, telephone conversations with EIP Associates, May 13, 1997.

13. Bill Dewey, Duncan Parking Meters, May 27, 1997.

During the baseball season (April through October) the meters are in effect until 10 p.m. every day. Typically the meters are programmed for a one-hour increment until 6 p.m., and a two-hour time limit from 6 p.m. until 10 p.m. During the off-season, parking is free after 6 p.m. The cost of parking ranges from $0.20 to $1.00 per hour. The Parking Management Division, which is responsible for parking enforcement, reprograms the meters twice a year based on the beginning and end of the baseball season using a hand held infrared sensor. At the request of business owners, one nearby commercial street does not have meters, but uses signage to indicate two-hour parking during the baseball season.

The programmable (or "smart") meters have been successful in addressing on-street parking concerns, due in large part to rigorous enforcement particularly when the meters were initially installed. Cars are also subject to towing and being ticketed up to two times at $15 per ticket. However, inevitably some business patrons forget to "plug" their meter and are penalized with a ticket.

The Department of Parking and Traffic has requested funding to replace the City's 14,000 mechanical meters with electronic meters. This replacement is being undertaken, in part, so that City meters can accept nickels, dimes and quarters, instead of quarters only. The electronic meters have the capability of being programmed similar to the meters in Denver near Coors Field. DPT has already replaced about 500 mechanical meters with electronic meters in the Taraval and Jackson Square commercial areas. Assuming that the meter replacement program is funded by the Board of Supervisors during the next fiscal year, the replacement program could be implemented within the two to five years.[14]

The Port of San Francisco also owns and operates meters on The Embarcadero and other streets in the study area.

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4 Tom Folks, Department of Parking and Traffic, telephone conversation with EIP Associates, May 29, 1997.

Parking Survey

Comments

I request that the mitigation monitoring program adopted by the Planning Commission in conjunction with the EIR include the following:

Immediately prior to the opening of the ballpark, a survey of on-street parking spaces shall be conducted by the Department (appropriate agency) documenting the number of spaces available during different times of day, including after 5 p.m., for all the streets on Potrero Hill in the area bounded by Vermont St. on the west to Third Street on the east, and between 16th Street on the North to 20th St. on the South and that a similar survey be taken of the same area on at least three game days and three event days within three months after the official opening of the ballpark. This information shall be made available to the residents of the survey area soon after its completion. Residents of the area shall be given ample time to review the information and an opportunity to meet with the appropriate officials to discuss and petition for additional mitigation measures, if such become necessary to alleviate adverse impacts of on-street parking resulting from the ballpark activity. (John Anderson)

So, my proposal is that there be a before-and-after survey of parking. And I have specified some streets. It could be applied to other areas also. This would provide a basis for some kind of objective determination of just what the impact is. So before the ballpark opens, I would like to see a survey of the on street parking in the areas specified, and at some time after a survey of on street parking so there can be some comparison. I would be very pleased if the survey showed no impact. (John Anderson)

Response

The comment is acknowledged. However, to provide a more accurate account of post-ballpark parking effects, the EIR preparers suggest the parking survey be conducted shortly after the ballpark is open on both a game and non-game day. Such a survey could be included as part of the permit parking approval process. See the first response under the *Preferential Parking-Residential Permit Parking Program* subsection of these responses, above.

Satellite Parking

Comments

Parking is very tight already. Perhaps the Giants should consider building enough parking to handle their needs, or park fans at the Ferry Building and shuttle them. (Elizabeth Carney)

If dedicated ballpark parking must be provided, it should be located outside the Mission Bay Project area and away from active maritime uses along Terry Francois Blvd., even on an "interim" basis. (Corinne W. Woods, Secretary, Bay View Boat Club)

[T]he goal of the Ballpark Transportation Coordination Committee should be to reduce the amount of dedicated parking in the area. We also suggest that you investigate the use of satellite parking lots outside of the area to bring fans to the game so they would park in other places, and then have additional shuttles to bring them in. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

If parking lots are to be made available, they should be out of the immediate area, near Candlestick Park, with shuttle buses running to China Basin. (Janet Carpinelli)

Pages IV.214-215, Parking mitigation measures: The last measure, for satellite parking north of Market Street with shuttles to the ballpark, should be instituted on weekday evenings as well as weekends. But why limit it to areas along Market Street between First and Fourth Streets? Some major parking facilities, such as One Maritime Plaza and Embarcadero Center, are located east of First Street. Satellite parking with shuttles south of the ballpark should also be explored, such as at the new UCSF campus. (Steven L. Vettel, Residential Properties Group)

If dedicated ballpark parking must be provided, it is inappropriate to site it on the waterfront and definitely not on Pier 50. The EIR should investigate parking to be provided further south of the project, either at existing 3-Com park lots or in the industrial areas off Cesar Chavez-Army Street with bus shuttles to the ballpark. (Randy Craig)

Response

The use of satellite parking for the ballpark could provide an efficient use of existing parking, thereby minimizing the need to build or lease new parking facilities. Satellite parking locations also could help disperse the parking and traffic impacts of the ballpark to several locations, and could encourage alternative modes of travel to the ballpark. Overall, satellite parking is most effective when it is combined with a limited supply of convenient or dedicated parking for the facility.

Several issues would need to be studied to implement an effective satellite parking/shuttle system. Alternate parking locations should be selected to minimize parking and traffic impacts on other residential areas. Shifting parking impacts from one neighborhood to another would not address parking issues for the ballpark. For example, additional local traffic generated by satellite parking lots near at 3Com Park could affect the Little

Hollywood neighborhood, as occurs now during sold-out baseball and football games at 3Com Park.

Except for 3Com Park or some other vacant site south of Mariposa Street, satellite parking would generally only be available during week night and weekend games due to the high demand for existing parking facilities during weekdays. (Also, if the proposed 49ers stadium and shopping/entertainment complex is constructed and occupied, parking at 3Com Park would not necessarily be an option for consideration as an alternate parking location, as the shopping complex would need parking for its visitors.)

Another consideration is securing agreements with lot or property owners for satellite parking. Would fans be expected to pay (presumably less than ballpark parking) to park in satellite lots? Who would supply shuttle vehicles? Also, fans could be reluctant to use satellite parking for evening games, if the facility does not provide security and adequate lighting. For maximum use, satellite parking/shuttle systems would need to be marketed and well advertised to fans.

The last measure on p. IV.215 of the EIR about satellite parking has been revised and expanded as follows (new text is underlined):

> **The project sponsor could explore the possibility of negotiating with parking garages north of Market Street which are closed or under used on <u>weekends and week nights</u> to provide satellite parking for Giants fans with a shuttle to and from the ballpark. Parking facilities should be targeted <u>to existing facilities North of Market Street, as well as outlying locations. Identified facilities in the downtown should be</u> clustered together within several blocks, so that shuttle buses could pickup fans from several parking facilities in a centralized location.**

See also the discussion in <u>Variants to the Proposed Project</u>, *Increased Dedicated Parking Variant*.

Permanent Parking Plan and Parking Policies

Comments

Parking: A mitigation measure was not proposed to address the parking deficit created by the Project. A permanent parking plan should be part of the duties required of the Ballpark Transportation Coordinating Committee. (David P. Cincotta, representing China Basin Landing, Ltd.)

While a *Transportation Management Plan* has not been produced, we would like to offer that it be based on the following Planning Principles:...

Residential and small business enclaves should be defined and protected from intrusion by ballpark related traffic by instituting preferential parking programs, programmable parking meters and other enforcement devices. (James Haas)

Adopt a policy of no ballpark traffic or parking on Potrero Hill. (Babette Drefke, Potrero Boosters & Merchants Association)

Response

The project would provide 5,000 spaces of dedicated parking for ballgames and other events at the ballpark. As currently proposed, this parking would be provided south of the China Basin Channel on an interim basis, partly to measure the level of demand for dedicated parking based on actual use of the parking facilities. Permanent parking would be developed as part of the re-planning of the South of China Basin Channel area which includes a proposal for a UCSF campus. While no permanent parking plan has been developed, it has been assumed that a 5,000-space parking structure would be located on property owned by the Port or by Catellus that would provide parking for the Giants. The text on p. IV.212, first full paragraph, has been modified to reflect possible use of Port property, as follows:

> **~~The concept plan developed by Catellus Development Corporation for the Mission Bay area south of the Channel, which includes UCSF, includes a site for~~ A 5,000-space parking structure that would provide parking for the Giants is assumed to have been built on property owned by Catellus Development Corporation or the Port of San Francisco in the Mission Bay Planning area. The site is expected to be located ~~just~~ in the area south of the Channel along Third Street.**

In addition to providing dedicated parking spaces, a permanent parking plan should also be integrated with an overall travel demand management plan to increase transit use, promote use of alternative transportation modes, and minimize overflow parking into residential and commercial areas. Implementation of a permanent parking plan would be the responsibility of the project sponsor and the City. However the plan could be developed and monitored by the Ballpark Transportation Coordinating Committee described on p. V.4 of the EIR. See the discussion in Transportation Mitigation responses, under *Ballpark Transportation Coordinating Committee*, for suggested measures such as a permanent parking program.

A policy that totally eliminates ballpark traffic and ballpark parking on Potrero Hill (or in South Beach) would not be practical to enforce. A combination of measures which restricts the availability of non-resident parking, and encourages commercial patrons, but deters ballpark parking (e.g., programmable meters, described above), coupled with strong enforcement controls and traffic rerouting plans would substantially eliminate any remaining incentives for those fans willing to walk 25 minutes or more to/from the ballpark to park on Potrero Hill.

Commercial Parking Shortages

Comments

The source of most problems associated with this Draft EIR is starkly illustrated in Chapter IV. Page 214, which reads as follows:

"Overall, South Beach residents who rely upon on-street parking (about 30 percent of the survey respondents) would compete with Giants fans for available on-street parking spaces in the study area on game days. Parking shortfalls are not considered a significant environmental impact because they do not produce any measurable physical effects, although they are inconvenient for many drivers and sometimes cause drivers to switch to transit or carpool modes."

I guarantee you that if you were a South Beach merchant who found out that none of their customers could park for a five block radius around their store, that you would consider the parking shortfall as a "significant impact." This neighborhood recently and painfully withstood two years of Embarcadero Roadway re-construction and the merchants and residents can already give testimony to the loss of convenience, not to mention hundreds of

thousands of dollars of lost revenue experienced by area merchants, brought about by parking shortfalls and traffic congestion. (James Haas)

[T]he source of most problems is associated with this particular section on Page 214. Quote, "Overall, South Beach residents who rely upon on street parking would compete with Giants' fans for available on street parking spaces in the study area on game days. Parking shortfalls are not considered a significant environmental impact because they do not produce measurable physical effects, although they are inconvenient from many drivers and sometimes cause drivers to switch to transit or carpool modes."

I guarantee you that if you were a South Beach merchant who found that none of the customers could park in a five block radius around their store, you would consider parking shortfalls a significant impact. This area has gone through a two-year turmoil with the reconstruction of the Embarcadero Roadway, and merchants and residents are just getting back to normal. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

Parking shortages are not considered a significant environmental impact as defined by Sections and 15360 and 15382 of the State CEQA guidelines because they do not produce any measurable physical effect. The EIR preparers recognize that the definition of *significant* impact under CEQA differs substantially from how business owners would view the significance of parking shortages. The phrase "significant impact" was not intended to diminish the importance of parking loss to businesses, but was used to describe significant impact as defined by CEQA. (See also Responses under "CEQA Procedural Issues.")

Parking Improvement Suggestions

Comments

Page V.54: There is no parking mitigation plan whatsoever. We suggest the following mitigation measures be required:

1. Residential preferential parking be instituted in South Beach and South Park, extended to include evening hours when there are evening events at the ballpark;
2. Programmable parking meters be installed in areas necessary to serve neighborhood businesses, limiting parking on-street to two hours during events at the ballpark;
3. Satellite parking with free shuttles to the ballpark must be developed, in locations both north and south of the ballpark, such as Embarcadero Center and One Maritime Plaza, UCSF and Candlestick Point.

4. A permanent dedicated parking solution must be a condition of continuing operation of the ballpark after the surface parking in Mission Bay is discontinued. (Steven L. Vettel, Residential Properties Group)

Residential and small business enclaves should be defined and protected from intrusion by ballpark related traffic by instituting preferential parking programs, programmable parking meters and other enforcement devices. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

I would like to state that I am a life long fan of professional baseball and have been intrigued by the possibility of being able to walk to a Giant's baseball game. Nevertheless, I am also very concerned with regard to the very likely negative effects that we should expect this proposed project to bring to our neighborhood. The insufficient number of parking spaces for the stadium will mean that residents, their guests, and business owners, and customers of those businesses will compete for scarce resources on event days and mitigants such as expanded hours for metered parking will only further inconvenience the large number of individuals that are in our neighborhood for reasons other than for attending an event at the ballpark (including baseball games, concerts, etc.). (John Gott)

Parking must be established on the basis of neighborhood permits and "smart" meters levying multiple fines should be employed. (Michael Kriozere, Urban West Associates of San Diego)

I am concerned that there will not be sufficient mitigation regarding parking...due to the additional pressures created by the ballpark fans and concert goers. (Elizabeth Carney)

Specific "Area Plan Assumptions" the DEIR must analyze, include:

- A preferential parking or other program in the Rincon Point - South Beach, South Park, Mission Creek and other affected neighborhoods, that insures adequate parking for residents, businesses, patrons and guests.

- A strategy to protect access and patronage for small businesses by providing "programmable parking meters" and other programs to assure parking, loading and access for patrons and clients, while discouraging congestion and loss of parking caused by drivers to ballpark events. (Martin Fay, Rincon Point – South Beach CAC)

Examples [of mitigation measures] include preferential parking program for affected residences and businesses, programmable parking meters to protect space for local businesses... (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

[R]esidents and small business enclaves need to be defined and protected from intrusion by instituting programs, programmable meters and other enforcement devices. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Although the DEIR suggests that a residential permit parking program may be appropriate if conditions warrant it, it is not clear that such a program provides the type of control that will satisfy all conditions and needs in the neighborhood. The problem with the residential permit parking program is that while it might be effective, with an assumed two hour limitation and active enforcement, in eliminating ballpark parking from the neighborhood, it has the potential to restrict parking by visitors to the area who are guests of residents, as well as customers of commercial outlets. Of course this is the instance in other neighborhoods of the City, but other areas have more severe on-street parking problems than South Beach, and the permit program does not extend very late into the evening.

The concept of programmable parking meters offers a method which should prove to be applicable to the South Beach neighborhood. These meters would offer a technique which would allow their use only on game days, such information to be posted on the meters or nearby. The price of the meters, which of course could be adjusted over time as conditions change, would not have to be high since the intent is to only enforce the meters in terms of duration of use. No penalty would be employed against residents, their guests, or customers, who "plug" the meters for a continued use of the space (during games).

A parking control program in the South Beach neighborhood which combines a residential permit parking program and programmable meters may offer the most effective solution. This program would allow residents to park in metered spaces on game days (evenings) without paying the meter since they could evidence the permit. Customers and guests would be required to pay the meter during these periods. Thus, on-street parking would be allowed by either the presence of a permit on the vehicle or a meter not in violation.

2. The DEIR does not address parking problems associated with the customers of commercial outlets in the South Beach neighborhood. These problems are quite distinct from those of the residents since the non-availability of parking for customers would mean the potential for a substantial loss of revenues. Restaurants which have an important evening trade would be particularly susceptible to this impact before and during evening games.

Mitigation measures such as those suggested - programmable meters, residential parking permit program, and strict enforcement - should effectively reduce this problem within the immediate neighborhood, but there is also the question of how far these measures should be extended. For example, on-street parking is provided along The Embarcadero north to Harrison Street. This is a parking resource which is currently used by customers of South Beach restaurants, since The Embarcadero provides convenient pedestrian access. If the parking management program does not extend northward to Bryant Street, and perhaps beyond, this resource of non-ballpark parking will also be impacted and South Beach commercial operators (as well as others to the north) will be affected. These impacts and questions should be further examined and mitigation measures, as needed, defined. (Douglas R. Wright)

Response

Responses in the 1) Preferential Parking, 2) Programmable Meters, 3) Parking Survey, and 4) Permanent Parking Plan and Policies subsections, above, address the specific measures requested in the comments above. These comments combined several suggested measures, but responses were prepared to individual issues in order to provide clear information on the different types of parking control opportunities.

Cumulative Analysis Assumptions

Comments

For the South of China Basin Channel area [which, incidentally was NOT adequately studied for impacts of visual quality and lighting (III.C), parking IIII.E.3), ambient noise (III.F.1), wind (IV.D.12), pedestrian impacts (IV.E.215) or crowd noise (IV.F.2)] the DEIR used the land use plan from the 1990 Mission Bay Plan (IV.107), except for some traffic studies using a UCSF cumulative scenario. That plan is dead, and in view of the extremely active proposal for Mission Bay South currently under review by the Redevelopment Agency, which proposes 3,000 housing units, a private research and development facility, 250,000 square feet of neighborhood retail along 3rd and 4th Streets, and 12.2 acres of city affordable housing in addition to the 43 acre UCSF campus, on about 230 acres, this is inadequate and inappropriate. The EIR should reflect, study and provide appropriate mitigation based on currently planned uses.

We understand from Catellus (Andrea Jones) that under current draft plans for Mission Bay South, the area to be used for parking will be developed for housing and open space in a later phase of the plan, and that a portion of Illinois Street will be vacated. The Mission Bay area dedicated parking is intended to be an "interim" use (IV.15, 23). If dedicated surface parking is initially provided in that area, it will be extremely difficult either to retrain and reorient stadium patrons to use public transit or to relocate dedicated parking later on without severely impacting the local neighborhood, and creating further traffic, access and parking nightmares. (Corinne W. Woods, Secretary, Bay View Boat Club)

IV.105 - Cumulative Development Scenarios

It is very difficult to understand the locations of these various areas without a map. Could you provide a simple map showing nearby areas in Waterfront Land Use Plan, Mission Bay, Rincon Entertainment Center, Transbay Terminal survey area? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Mission Bay North/Mission Bay South/UCSF: The effects of and on these projects which will produce cars, businesses and public transportation needs for its thousands of new residents [have] not been sufficiently addressed. (Janet Carpinelli)

IV.84) We are not addressing the year 2015, we are more concerned with now. (Mariuccia Iaconi)

Area-wide Traffic Issue: While this DEIR does examine the effect of the project, plus UCSF at Mission Bay, no attempt is made to examine the cumulative effect of the new plans for the entire Mission Bay project area, nor is the larger impact to the southeast quadrant of the City from the combined development of South Beach, PacBell Park, North Mission Bay, UC Mission Bay, Home Depot, and 49er Mall examined. These cumulative impacts are larger

than a ballpark consideration. Southeast development is on a fast track, and the projects are being reviewed in piecemeal manner. The City must grapple with the traffic related to all of the developments emerging in Mission Bay/South Beach and areas to the south, and provide long-term solutions into the next century. (Philip De Andrade, delegate of Mission Creek Harbor Association)

A proposal for Home Depot at Pier 80 would bring an additional 527 cars. Plans for UCSF would bring at least another 500 cars. (Babette Drefke, Potrero Boosters & Merchants Association)

What I would like to talk to you about is the fact that the DEIR does not address -- except for some minor traffic -- well, they did discuss traffic on UCSF on the south of the channel, they did not address any of the other issues involving Mission Bay north or Mission Bay south. I think one of your next projects is going to be to approve one of the first parts of Mission Bay south, the UCSF R&D facility...

The Mission Bay project will bring 6,000 housing units plus, we hope, UCSF to this area. They may not happen over night. They may not happen immediately after the ballpark opens. But they are going to be there when the ballpark is there. And I think the DEIR really needs to address all of these impacts, plus sewage, life safety and quality of life issues, the bridge closures, how that impacts Mission Bay. The proposed CalTrain downtown extension. The cumulative impact of those with Mission Bay and the ballpark were not addressed in the DEIR. (Corrine Woods, Bay View Boat Club, Mission Bay Citizens Advisory Committee)

IV.105, Cumulative Scenario: The text is unclear as to exactly what changes have been made in response to the identified projects. A summary table should be added that shows the base line and then additions for each project and the cumulative impacts of all of the projects.

The MTC Regional Model needs to be supplemented with current traffic counts in order to verify baseline conditions. The model data is several years old and is at a gross level of data aggregation. Impacts of things like Moscone, Yerba Buena, and the closing of the Central freeway have caused traffic congestion increases in excess of what the model had predicted. Baseline conditions need to be adjusted to reflect the real existing baseline conditions.

Other projects that should be included in the cumulative analysis include Treasure Island development and the Moscone Center expansion. (Diane Nygaard)

IV.106 Do your projections include a major new hotel at Pier 40? The Agency is proposing to put parking for the marina under the park expansion, rather than on Pier 40, because they want to use Pier 40 for a hotel -- despite the vote banning waterfront hotels. If a hotel is located at Pier 40 there will be significant effects on traffic in the area of the ballpark. Is the impact from this development factored into the cumulative development scenario? (Sue C. Hestor, Advocates for South Beach Harbor)

Area-wide Traffic Issue: While the DEIR examines the effect of the project plus UCSF at Mission Bay, no attempt is made to examine the cumulative effect of the new plans for the whole Mission Bay project area, nor is the larger impact on the Southeast quadrant of the City from the cumulative developments of PacBell Park, North Mission Bay, UC Mission Bay, Home Depot and the 49er Stadium/Mall. These cumulative impacts are larger than a ballpark consideration. The City must grapple with the traffic related to all of the development that is emerging in Mission Bay/South Beach and areas to the south, and provide long term solutions into the next century. (Philip DeAndrade, Mission Creek Harbor Association)

In plain language, this DEIR predicts devastating South of Market traffic gridlock throughout much of the South of Market on game days, and terrible traffic the rest of the time. Third and Fourth Streets in Yerba Buena will be especially hard hit. And it does not even include updated traffic impact calculations for the more intense future development of Yerba Buena area, including more hotels, the Moscone Center Expansion project, and the Bloomingdale's project. (John Elberling)

Page IV.109, Mission Bay South: Are the other land uses in Mission Bay South stated here consistent with current Catellus plans, now that a UCSF campus appears likely? (Steven L. Vettel, Residential Properties Group)

Response

CEQA requires that the cumulative impacts analysis consider all reasonably foreseeable short-term and long-term growth and development relevant to the project's study area. Appropriate sections of the EIR include cumulative impacts analyses. To this end the transportation analysis included two Year 2015 Cumulative scenarios. The first, the cumulative-plus-project scenario, was based upon the Year 2015 growth assumptions presented in the Association of Bay Area Governments (ABAG) *Projections '96* with some adjustments in location of growth within the greater downtown area to account for reasonably foreseeable development plans such as growth in the Yerba Buena, Transbay Terminal, Mission Bay and Waterfront areas. (See pp. IV.105 - IV.110 of the EIR for a discussion of the surrounding areas specifically accounted for in cumulative analyses, as relevant.) The adjustments did not increase the ABAG projections, but moved some projected growth within the greater downtown area to account for the expected increased growth in the Transbay Terminal area and the lower employment growth/greater residential growth expected in the portion of the Mission Bay area north of China Basin Channel.

The Mission Bay area, the relevant portions of the Port of San Francisco jurisdiction for the Waterfront Land Use Plan, and the Rincon Point - South Beach Redevelopment Area are described and shown in the EIR in the section on Consistency with Existing Plans and Policies and on Figures III.A.1, III.A.2 and III.A.3, on pp. III.10 - III.20 of the EIR. The Transbay Terminal area is the area surrounding the existing Transbay Terminal at First, Fremont and Mission Streets, as noted on p. IV.108 and as shown on Figures III.E.1, III.E.2, and IV.E.1 and many other figures in the EIR.

The change in the Mission Bay growth assumptions was based on the lack of development in the recent past, on the termination of the Development Agreement by the property owner—Catellus Development Corporation—and the City, in 1996, and on preliminary concept plans presented by Catellus in the fall of 1996 for the northern portion of the Mission Bay planning area. Thus, housing included in the ABAG forecasts for the Mission Bay area south of China Basin Channel was shifted for the local transportation analysis to the north-of-Channel area of Mission Bay to account for housing proposed to replace previously-planned office development. Approximately 66 percent of the jobs included in the ABAG forecast for the northern portion of Mission Bay by the year 2015 were shifted to the Transbay Terminal analysis areas to account for expected growth in that area and to account for the change from office to housing uses in this part of Mission Bay. The result does not change the overall ABAG forecasts for the City or the region, but reallocates the growth to areas that appear, based on current information, to more appropriately reflect the location of growth forecast for the City. These adjustments are described in more detail in the *Transportation Background Report for the San Francisco Giants Ballpark at China Basin*, March, 1997, pp. 3-26 to 3-30.

As the proposal to include a new University of California at San Francisco campus in Mission Bay south of the Channel became known during the preparation of the transportation analysis, a new cumulative scenario, entitled the UCSF/Mission Bay cumulative scenario, was added. This was because it was clear that the UCSF major new campus, if approved for the Mission Bay area, would exceed the employment projections for the year 2015 in

Projections 96. This scenario includes both UCSF and a development program for Mission Bay based on preliminary conceptual plans in preparation by the Catellus Development Corporation.

The year 2015 was used as the analysis year for the future cumulative impacts analysis because this is the analysis year used by ABAG for its long-term regional growth projections, and because it provides a reasonable future date well after the project is expected to be in operation, enabling analysis of the project in the context of reasonably foreseeable future growth in the project area and the region.

The traffic analysis was based on the regional transportation model prepared by the Metropolitan Transportation Commission (MTC). This regional model incorporates ABAG *Projections '96* growth forecasts to predict future traffic on freeways and on major streets and roads on a region-wide basis; it accounts for growth and change in transit use as part of assigning traffic to the system. The MTC model forecasts were compared with the forecasts developed as part of the EIR transportation analysis at key regional screenlines defining the project study area (described in the *Transportation Background Report* and shown there on Figure 1-4, following p. 1-8). The cumulative forecasts at the regional screenlines were then adjusted to agree with the forecasts from the MTC model at these points. This calibration process results in future traffic forecasts on each street in the study area that yield total traffic flows that are consistent with the results of the MTC regional model. For the UCSF/Mission Bay scenario the same process was used after the MTC model had been adjusted to reflect the additional growth estimated for UCSF/Mission Bay.

The cumulative transportation impacts analyzed in the EIR added the proposed San Francisco Giants ballpark transportation activity to both future scenarios because the growth forecasts did not include a major sports facility.

The EIR's cumulative analysis scenarios accounted for additional traffic that would be generated by known development potential in the surrounding area on a large scale. The

MTC model includes regional and City-wide growth forecasts based on ABAG's *Projections '96*, thus ensuring that smaller-scale developments in the City and rest of the Bay Area were also captured in the cumulative traffic analysis. The Home Depot proposed for Pier 80, cited in a comment, is an example, as its impact is included within the City-wide economic growth projections in the MTC model. The Home Depot project is reflected in the *Projections '96* forecast for that analysis zone (see Table X.C.9, p. A.94 in the EIR Appendix where traffic analysis Zone 622 covers the area where Home Depot would be located if it is approved, and includes nearly 3,400 additional jobs by 2015.) The Home Depot project site is well south of the area where the primary traffic activity related to the ballpark would occur.

Similarly, the ABAG growth projections include considerable amounts of future growth in the Yerba Buena Center Redevelopment Area. For example, Analysis Zone 661, which encompasses a portion of the YBC area, includes 5,200 new jobs by the year 2015, and 312 new households. Traffic from this job growth is accounted for in the regional transportation model.

The 49ers proposed new stadium and shopping mall at Candlestick Point was subject to voter review for public financing and rezoning. Both measures were passed by the voters on June 3, 1997. However, details of the shopping mall were not available during preparation of the Draft EIR, and are not yet available. Therefore, this project could not be included in the cumulative transportation analysis. The traffic impacts of the 49er Stadium/Mall project would not likely have a major effect on the Giants ballpark transportation analysis. 3Com Park currently is the site for 49ers football games; therefore, new transportation effects would be related largely to added traffic from the shopping mall. Because it is reasonable to assume that traffic destined for the shopping mall would primarily use the U.S. 101/Candlestick interchange and Harney Way to access the parking area, several miles distant from the areas impacted by the ballpark, it is not expected that substantial cumulative impacts would occur if both facilities were approved and occupied.

The parking analysis accounted for development on several existing parking lot sites but removing these sites from the inventory of parking potentially available to giants fans. As explained in notes to Table IV.E.39, Cumulative + Project Parking Surplus (Shortfall), p. V.210 of the EIR, it is not feasible to make assumptions as to the parking demand from new buildings that may be built during the 1997-2015 time frame of the cumulative analysis, as it is not known what the parking demand might be of the ultimate uses installed in new buildings or how much parking they would include on-site.

If the ballpark project were implemented without any planned transportation improvements or mitigation measures, there would be significant impacts as noted in Chapter IV of the EIR. As discussed in the Mitigation Chapter of the EIR, under the detour plans, combined with other measures such as the use of Parking Control Officers (PCOs) and special signal timing plans, most intersections would be operating at an acceptable level of service standard (see p. V.17 - V.45, and Table V.B.3, pp. V.35 - V.38). Traffic impacts would be most noticeable during the hour before and after a game, and there would be minimal impacts during all other times.

The traffic noise and the air quality analyses in EIR Chapter IV, Sections E and F, include both existing-plus-project and cumulative-plus-project analyses. Both cumulative scenarios—using adjusted ABAG projections and using the UCSF/Mission Bay scenario—were studied for traffic noise and for air quality. Both the traffic noise and air quality cumulative impacts analyses were based on cumulative traffic information obtained from the traffic analysis described above. The concert noise analysis assesses impacts at nearby sensitive receptors; the EIR accounts for the approved residential building across from the ballpark site at King and Second Streets and for potential residential uses in the Mission Bay planning area north of China Basin Channel (Locations F and G on Figure IV.F.2, p. IV.253). Additional concert noise analyses were prepared for sites in the south-of-Channel area to assess possible concert noise impacts on residential and hotel uses that are included in the preliminary conceptual plans for that portion of the Mission Bay area (see Summary of Comments and Responses, Noise, South of Channel Area). Therefore, the noise and air

quality sections of the EIR include relevant cumulative growth analysis, accounting for reasonably foreseeable growth in the area surrounding the project site.

Shadow analyses depend on specific building forms and therefore can only include future development if the necessary level of detail is available for nearby proposals. Thus, for example, the proposed new entertainment and residential uses across Third Street in the Mission Bay area are included in the transportation and traffic noise cumulative analyses but could not be included in shadow diagrams because specific building forms have not yet been established. The wind analysis in the EIR was performed for the project in the existing wind setting and also in a cumulative context with potential development of buildings in the Mission Bay North of Channel proposal (pp. IV.64 and IV.70 - IV.72. This cumulative wind analysis was possible because the wind tunnel can use approximate maximum building envelopes, although design features proposed for specific buildings in the future could result in somewhat different wind speeds and directions at some locations.

The analysis of impacts of night lighting at the ballpark includes discussion of effects on the approved residential building across King Street from the project site (EIR p. IV.38). The land use and growth inducing effects analyses also discuss future development in nearby areas, as relevant (see, e.g., pp. IV.23 and IV.331 - IV.333).

In summary, the EIR analysis cumulative impacts of the proposed ballpark and dedicated parking lots thoroughly, at an appropriate level of detail for relevant topics.

Analysis Assumptions

General Assumptions/Methodology

Comment

Throughout this EIR presentation, I get the gnawing feeling that the studies of public transit capacities and headways, pedestrian flows, arterial traffic flow (CMP) and freeway models (MTC) were all conducted independently in isolation and not in conjunction with each other; i.e., not interactive. (Silva B. Creg)

Response

The fact that the EIR transportation discussion presents the topics of transit, traffic, parking, pedestrian/bicyclists separately may tend to imply that each of these travel modes was the subject of a separate analysis. This was not the case. The actual methodology used started with an analysis of the geographic travel distribution of existing and future ballpark patrons without regard to the mode of travel used to travel to the game. Surveys of Giants ballpark patrons provided the basis for this distribution. Once a geographic distribution was established, then the analysis focused on the alternative modes of travel available to reach the ballpark from each geographic zone. Travel was distributed between auto, transit and other travel modes based upon the quality of the access and egress each mode afforded the ballpark. The demand for auto use took into account the current and future availability and the price of parking, as did the demand for transit use. Estimated pedestrian flows were based upon the identified distribution of parking demand around the ballpark, the location of transit stops and stations nearest the ballpark, and the routes that downtown area workers, residents, and visitors would use to reach the ballpark. As a result, the allocation of travel by mode was interactive. If a change in transit use was anticipated, for example due to ballpark ferry service, the number of persons driving and using other competing transit modes was reduced accordingly. Chapter 3 of the *San Francisco Giants Ballpark at China Basin Transportation Background Report* provides detailed documentation of the details of this process, summarized in Section III.E of the EIR.

The approach used was to attempt to define the maximum impacts of the ballpark. For example, all games were assumed to be sellouts. The assumptions that were used were selected to be conservative so as to not understate impacts, but were by no means absolute "worst case" scenarios. A worst case scenario, such as 100 percent of all ballpark patrons driving to the game alone, was not addressed, as it is not a reasonable scenario given the known experience at 3Com Park and at other ballparks. CEQA requires that the transportation impact analysis be defined to identify the maximum reasonable degree of impact, not necessarily the absolute worst case.

Mode Split

Comments

The following underlying questionable assumptions need additional documentation in the EIR...Two, transit use will jump from 3.5 percent to 30 percent for fans. (Joel Ventresca)

First and foremost, it is ill advised to believe that fans or attendees will take public transportation. The public is wedded to private automobiles; especially in the evening. (Mariuccia Iaconi)

(III.65) It is not realistic to assume that travel by rail or Muni will adequately increase unless (mitigation) a substantial discount is given to ticket holders (suggested $10. per ticket) is offered attendees. (Mariuccia Iaconi)

(III.92) Local residents of Potrero Hill as well as other parts of San Francisco, do not like using the Muni 15. Some regard it as dangerous as well as not being frequent enough. (III.94) Low use of Muni is cited here. 3.5% of patrons use it!!! It is exceedingly difficult to change the travel habits of fans and as mentioned before, Muni service is not held in high regard in this neck of the woods. (Mariuccia Iaconi)

IV.99, Mode Split Assumptions: The previous EIR showed a separate mode/split analysis for fans from each key direction/location. This made it clear that the highest percentage of transit use was from SF residents, and that this varied depending upon location of home end of the trip. This draft does not identify the assumptions of mode split by location, but makes a blanket assumption that transit will carry 30% of the weekday afternoon trips.

This mode split assumption is critical for the traffic and parking impacts analysis. The EIR needs to provide more details about the assumptions. This needs to be combined with a much more aggressive program of parking disincentives and transit incentives in order to be

viable. (Diane Nygaard)

The EIR should analyze in detail the multimodal transportation requirements for weekday games, since return trip demand may conflict with the p.m. peak period. It should also address possible conflicts with the p.m. peak for weeknight games. Experience indicates that the peak period may extend beyond the 4-6 p.m. on the freeway system (starting earlier and ending later). (Jeffrey Leibovitz)

[T]raffic congestion in the neighborhood is currently and frequently extremely congested. And while the Department of Parking and Traffic occasionally will send traffic officers to assist with the congestion, the addition of the numbers of cars likely to attend ballpark events will only make a frequently bad situation worse. The Giants state that they will encourage alternative forms of travel to the ball park, but the likelihood of achieving success in converting sufficient numbers of a population well trained to the concept of preferring to use their autos for travel to such events really should be considered remote and any degree of success will take a significant time frame for retraining such behavior which limits the potential for success. (John Gott)

Fans from the south will mostly drive since the only public transportation from the South is CalTrain, and it does not have and cannot afford to buy the extra cars needed for the large volume for the ballpark, several days per week, and also handle the commuter passengers. (Jerry A. Peterson)

One issue I don't quite understand is everyone is talking about the influx of cars. The San Francisco Giants, it is my understanding that they have only 210 dedicated parking places at the ballpark. I feel that the people will learn quickly to take public transportation, to take the trains, to take BART and the ferries.

...Two years ago, the Giants had like a pilot program, and they had six Sunday games where people took ferries from Marin and the East Bay. I was working when the people, the fans came off the ferries. The response was overwhelmingly positive. They were so excited. It was such a wonderful experience. They thought that was the only way to go to a game. It was a full-day event. I can see that being a real big success with the new ballpark that we are going to have.

In Chicago, I have friends who tell me they only have 100 dedicated parking spaces there. People take the train. People walk. It [has] been working for years. It works in New York. It works in all the big major league cities. I don't see why it can't work for San Francisco. (Michelle Herrera)

I feel that the San Francisco Giants have worked very hard in creating transportation available to the fans and to the people of the neighborhood. They will be coming to the new park by bus, ferry, taxis, Caltrans trains, shuttle buses. So I feel that the traffic jam coming and going to the park won't be that bad. (Teresa Archuleta)

[T]ransportation seems to be an issue to many of the people who are located immediately adjacent to the park. I don't think that would be a problem. As I said, I worked in the Financial District. It is quite -- the projected site is quite eminently walkable from that district. No problem. People will, as one of the speakers mentioned, adjust themselves to any difficulties that might exist with respect to a particular mode of transportation. I think people will get there. (Thomas Hesketh)

I know that there is going to be traffic. We all know when we voted for this that there was going to be traffic. This is a city. It is not an Iowa cornfield. I once took a bus to Candlestick Park. It took me twice as long, and it was three time as expensive as putting my family in the politically incorrect family car and hauling us out there. I'm not stupid. If it is easier to get to the ballpark on a bus, on a ferry, on a train, I'll go that way. I won't take the car. (Penelope DePaoli)

(III.69 Cal Train) It is unlikely that attendees at games or events will use Cal Train for night games, in particular. As mentioned before, people are wedded to their cars. Until service reaches a level of complete safety, regularity and frequency of service, cars will remain the primary mode of travel. (Mariuccia Iaconi)

As a citizen of San Mateo, I have judged transportation to be the major concern regarding the ballpark. The DEIR has reviewed the issue to great length. It has pointed out that to put it mildly, it will be not unlike the "egg in the rattlesnake" at times. These times I believe will be appx 13 times for the end of day games, mainly, and perhaps for before night games also, but not to a great extent.

I want to say that I believe this to be more aberrant than the norm. I for one plan to use public transportation, namely BART to and from the games. I will not be cutting through neighborhoods and not be adding to the traffic situation already in that neighborhood. I do not believe that I will be alone either. Many people will be doing as I plan on doing, simply because it is a smarter way than to put ourselves in lines.

I think that in this way, many of the situations brought out in the DEIR will mitigate themselves. This is not to take a naive stance, but I sincerely believe that people will find the solutions themselves.

All participants have to play a part. We need especially to build a strong public transportation policy. (Robert A. Arsenault)

The DEIR mentions several transit mitigation measures to increase transit use to the ballpark; the DEIR estimates a 30% transit mode share. MTC's Regional Transportation Plan (RTP) indicates that Muni will have a substantial long-term operating shortfall. The extra Metro service envisioned as part of the mitigation plan would exacerbate this estimated shortfall.

this would also potentially create problems for CalTrain service since San Francisco is a contributor to that service.

The mode split and auto occupancy rates would seem to indicate a "best case" scenario. The assumptions should allow for a worst case analysis of traffic impacts, as required by CEQA. (Doug Kimsey, Metropolitan Transportation Commission)

Response

The estimation of the mode split, the percent of ballpark patrons that would use transit and other non-auto modes to and from the ballpark, was given extensive consideration in the transportation analysis for the new Giants Ballpark. The current experience at 3Com Park was not considered to be a valid comparison with the transit setting of the new downtown ballpark. 3Com Park is isolated from the regional transit network, and ballgames are served only by special ballpark or charter services. Parking at 3Com Park is ample for most games, as there are 8,400 spaces in the main lot and over 8,000 more in surrounding lots operated by private companies. In contrast, the new ballpark, which is proposed to be located in a downtown environment, with direct service by rail and bus transit and with convenient transit links to the other regional transit providers, including BART. In addition, downtown employees who would attend games are as a group major users of public transit. There would be no parking for ballpark patrons on the ballpark site itself, and the only dedicated parking supply for the ballpark would be approximately 5,000 spaces to be located south of the China Basin Channel. Otherwise ballpark patrons would have to seek out available on-street and off-street parking, mostly north of the Channel. As the actual demand for parking would well exceed the available supply, there would be substantial incentive for ballpark patrons to use public transit and other non-auto modes of travel.

There has been no "previous" EIR for a ballpark at the China Basin site, as suggested by one comment. The mode split assumptions for the ballpark project were based upon both the experience of other ballparks located in the downtown areas of major cities and the characteristics of visitors to San Francisco as documented in the 1993 *Citywide Travel Behavior Survey* (CTBS).

Chapter 3 of the *San Francisco Giants Ballpark at China Basin Transportation Background Report* presents a detailed mode split analysis for ballpark patrons traveling from each key direction and location. Tables 3-11 through 3-14 document these assumptions. It is not correct to state that the EIR used a "blanket assumption" that transit will carry 30 percent of the weekday afternoon trips. The percentage was carefully developed considering each geographic travel market, the time and direction of travel, and the availability of transit services in that direction and time period.

Table 3-10 in Chapter 3 of the *San Francisco Giants Ballpark at China Basin Transportation Background Report* documents the mode split experience of other major ballparks. Those ballparks in urban downtown areas show higher rates of transit use than the suburban ballparks.

The mode split analysis took into account the potential transit use characteristics for different game times. For example, week night and weekend games were estimated to have a lower transit mode split than weekday afternoon games (see Table IV.E.6, p. IV.100). More patrons were assumed to reach weekday evening ballgames by transit than were assumed to use transit to return home. This is the current experience at the Oakland Coliseum which has direct BART service. On weekday evenings many ballpark patrons arrive for events by transit but arrange to ride home with a friend or family member. This accounts for the fact that the quality of transit service available declines in the evenings as compared to the frequency of service midday and during peak commute periods. Also there is the perception as noted in the comments, that some transit service might not be safe to use in the late evening, such as after a night ballgame.

The analysis assumed that the transit operators would charge normal transit fares for transit use to ballpark events. No special discounts or other fare provisions were assumed. Incentives such as discount fares were proposed as a potential transportation improvement in the Mitigations discussion under the section entitled "Transit Incentive Program" on p. V.43 of the EIR.

The transit analysis was sensitive to the fact that if transit operators have to provide added service to serve the ballpark they will experience increased operating costs and may also need to purchase new equipment. As a result, the assumed level of transit service available was consistent with the current services and plans provided by most operators. In cases where more service was needed it has been clearly defined as noted on pp. IV.81-IV.83 of the EIR. For example, as noted in the comments, CalTrain would be the primary transit travel option for ballpark patrons traveling from the south. The CalTrain Joint Powers Board (JPB) passed a resolution indicating their support of providing CalTrain service for ballpark events. As a result, as noted on p. IV.83 of the EIR, it was assumed that CalTrain would provide additional service in the form of a weekday evening train after ballgames and additional cars for other existing trains on weekdays and weekends to provide capacity to serve the ballpark patrons. As the CalTrain station at Fourth Street, or at a new Fifth Street location, is within walking distance of the ballpark site, it would be a viable travel option for ballpark patrons traveling from the south.

Trip Distribution

Comments

The following underlying questionable assumptions need additional documentation in the EIR...One, people will spend 30 to 40 minutes walking to and from their cars. Six, the fan base will shift. And, seven, a high level of transit service will occur in the area. (Joel Ventresca)

IV.94, Arrival/Departure Patterns; IV.97, Non-Home Based Trips: The text identifies 31% of existing fans come from outside of the Bay Area. It is unclear how these trips have been allocated. Table IV.E.5 does not indicate what % of total trips are being allocated.

V.96, Proportion of Non-Home Based Trips: SF City Planning Department employer trip surveys show decreasing numbers of San Francisco workers employed in the downtown area. The EIR appears to assume that work based trips are generated from downtown, based on the studies from other cities. Trip origins need to correctly reflect the distribution of San Francisco workers -with only a portion of those located in the downtown area. (Diane Nygaard)

The other thing that we are complaining about is they are comparing San Francisco to Denver. Now, there is no comparison there. Denver has land on four sides. They can exit the place and go four different directions, whereas the San Francisco one only has an exit in one direction, Potrero Hill. So, don't count that either. South Beach, too, but that is so small compared to Potrero Hill. We are sorry for them, too. (Babette Drefke, Potrero Boosters and Merchants Association)

How would you drive, green or blue? The dedicated parking is clearly marked, the dark squares and rectangles. If you were coming from the Peninsula, would you go the green route, the route that the EIR says no one, or four percent of the people will go? Or would you take the blue route to reach this parking?

Fans will not drive to...the north side of the channel where the ballpark is located and come back across through congested areas to get to the dedicated parking. It is crazy. I wouldn't do it.

If you are coming from the Peninsula, you are going to come up and you are going to exit on the south side of the channel, which is exactly where Potrero Hill is located. This is one instance, this is one example of the kind of conclusions that I believe are false in the draft EIR. (Sarah Ames)

Response

The information provided in the EIR regarding the trip distribution of ballpark patrons was developed from market research surveys of existing Giants ballpark patrons conducted by the Giants. Contrary to the notation in the comments, there was no reference to 31 percent of existing ballpark patrons coming from the outside of the Bay Area on p. IV.94. This section of the EIR is a summary of a much more detailed analysis provided in Chapter 3 of the *San Francisco Giants Ballpark at China Basin Transportation Background Report*. Table 3-5 of this background report summarized the results of the market research surveys. The reported percentage of ballpark patrons coming from outside the Bay Area ranged from 10 to 31 percent. The reason for the range in percentages appears to be a difference in the definition of the boundaries of the Bay Area in the two surveys. Tables 3-7, 3-8 and 3-9 of the report provide a complete geographical summary of the distribution of both home-based and non-home based trips.

Table IV.E.5 in the EIR, p. IV.97 presents the percentage of the total ballpark trips before and after weekday afternoon, weekday night, and evening games that were assumed to be non-home based. As footnoted in this table, these exclude trips from outside the Bay Area. Tables 3-7, 3-8 and 3-9 in Chapter 3 of the *San Francisco Giants Ballpark at China Basin Transportation Background Report* indicated that 10 percent of the ballpark patrons for a weekday afternoon games would come from outside of the Bay Area, 7 percent for a weekday night game and 8 percent for a weekday game.

For San Francisco, the distribution of non-home based trips was based upon current employment data by traffic analysis zone from the Association of Bay Area Governments (ABAG) *Projections 96*. The area referred to as the "downtown" on p. IV.96 of the EIR consists of the area bounded by Broadway on the north, Van Ness Avenue on the west, the Bay on the east and China Basin Channel on the south. The ABAG projections do not indicate that employment in this area will decline, and current development planning efforts such as Rincon Hill, the Transbay Terminal Area, and the Mission Bay project suggest that much of the employment growth in San Francisco will be near the ballpark.

The analysis of the geographic distribution of current Giants ballpark patrons involved a detailed evaluation of how the location and the nature of the new ballpark might result in changes in the distribution of ballpark patrons. The new location of the ballpark as compared with 3Com Park would make the ballpark more accessible from some areas and less accessible from others. In addition, the downtown location of the ballpark places it within walking distance or a short transit or auto trip for downtown employees and visitors. Chapter 3 of the *San Francisco Giants Ballpark at China Basin Transportation Background Report* provides a detailed evaluation of the potential for shifts in the geographic distribution of the fan base for the new ballpark.

The ballpark analysis was based on assumptions derived specifically for San Francisco conditions. However, research on other downtown ballparks confirmed that downtown

employees and visitors would likely join the fan base of the new ballpark. The new ballparks in Denver and Baltimore are good examples of this.

Coors Field in downtown Denver has a lot of similarities to the new ballpark. It is located away from the heart of the existing downtown in an area known as Lower Downtown or LODO. This area is very similar to South of Market. Access to the site is constrained by a large railroad yard along one side, much in the way China Basin Channel would constrain access to the ballpark. Coors Field has a large surface parking lot for ballpark patrons near the ballpark (about 6,000 spaces), but most ballpark patrons who drive must seek out available parking in off-street facilities elsewhere. Coors Field does not have direct freeway access, ballpark patrons must uses various surface streets to reach the ballpark area. Transit is available to the downtown Denver area, including light rail within a few blocks, again similar to the proposed San Francisco site.

For traffic traveling north to the ballpark from the Peninsula the following travel route options were assumed: I-280 northbound to the Mariposa Street interchange to Third Street and Terry A. Francois Boulevard; I-280 northbound to either the King Street or Sixth Street ramps; U.S. 101 to Third Street; and U.S. 101 to Vermont Street. Traffic was assigned to these routes in proportion to the amount of parking that would be available within a 15-minute walking distance of the ballpark. While there would be a large designated ballpark parking area just south of the Channel, there would also be parking available north of the Channel which may be less expensive and provide access to other uses (shopping, restaurants, recreational sites) as well as the ballpark. The EIR did not assume that most people would walk 30 or 40 minutes from parking to the ballpark.

Attendance Assumptions

Comments

The DEIR erroneously minimizes significant impacts by stating that only the 13 afternoon day games could contribute to significant environmental impacts. (Martin Fay, Rincon Point – South Beach CAC)

[T]his is a worst-case scenario based on every single 81 home games being a sell out. The games that produce the worst traffic and parking and other impacts are only 13 weekday, day games, which would, just by nature, have the lowest or at least not be sell outs or be lower attended than certainly a weekend day game or a weekday night game. (Neil Rabin)

[T]he EIR takes into consideration that every game would be a sell out. Although, I think the Giants would like that, I find it highly unlikely. (Clayton Green)

The reason this park is being built, obviously, is for the same reason. It is revenue generating. People will say, well, you know, the Giants are doing poorly and they show poor attendance at this time. Let me tell you something, folks, these are beautiful parks. For the first year, at least, they are going to be well attended so the worst case scenario can be expected on every single game day, let alone the other events that will occur at this park. So, to say and brush this off as a worst case scenario is putting a light edge on this. Denver set records for sell out attendance. The park is beautiful. Denver is Denver. This is San Francisco. The Giants hope to attract a completely new fan base. (Jeffrey Leibovitz)

The following underlying questionable assumptions need additional documentation in the EIR...Four, 3,000 ticket holders won't show up for sold out games. (Joel Ventresca)

Response

The transportation analysis addresses the environmental effects of all weekday afternoon, weekday night, and weekend day games that would occur each year as well as the effects of other non-ballgame events. The impacts of the weekday afternoon games and events are cited as being the most substantial because during this period, parking is much less available than it would be on nights and weekends, and the game or event would end in the late afternoon, just before the afternoon commute period begins. As noted in the EIR (e.g., p. IV.103) and below, an occasional ballgame or event could end during the weekday afternoon commute period, contributing to already congested conditions on city streets and freeways.

The assumption that all games would sell out was made to assure that a "worst-case" situation was analyzed. It is likely that many games would not be sellouts. At the same time, it is clear that a primary reason for building the new ballpark would be to attract increased attendance. Other new downtown ballparks (Denver, Baltimore, Cleveland) have experienced very high attendance levels.

While all games are assumed to be sellouts, a review of the attendance records of the Giants and other major league teams made it clear that there is a substantial no-show phenomenon, i.e., ballpark patrons who buy tickets but do not attend. The statistics made it clear that it was not reasonable to assume that a sellout meant that every seat would be occupied. The assumptions used for no-shows in the Transportation Analysis were conservative, purposely lower than the actual observed statistics for the Giants and other major league teams.

Game Time

Comments

IV.78, Study Time Periods: Based on the Giants data 22% of the games last more than 3 and ½ hours. The analysis for the post-game weekday afternoon should be extended to 5:30 p.m. in order to identify the real impacts on the p.m. commute period. The weekend afternoon pre-game time should also be added as this is a time of high Bay bridge congestion. (Diane Nygaard)

In order to analyze traffic impacts, the DEIR employs assumptions regarding the starting times of games at the Giants Ballpark, assumptions based on empirical evidence about the average length of games, and assumptions also empirically derived about the behavior of fans arriving at and departing 3Com Park and other ballparks. This information is analyzed in terms of travel patterns and volumes to determine the traffic impacts in the ballpark.

The DEIR properly concludes that [the] longer that the 12:35 p.m. weekday afternoon games go past the three hour average length, the greater the severity of the resulting traffic problems and the more difficult the resource strain on the Municipal Railway. Recognizing the limited number of weekday games assumed, a nonetheless simple mitigation measure would be to begin the games at 12:05 p.m., a time which would add an important thirty additional minutes of margin with respect to traffic impacts and which would also more closely coincide with the lunch schedule of many potential fans. (Douglas G. Wright)

The following underlying questionable assumptions need additional documentation in the EIR...Five, weekend afternoon games would be over before the afternoon p.m. peak hour, 4:30 to 5:30 p.m. (Joel Ventresca)

Response

The times that games start are not totally within the control of the Giants. League rules require a certain number of hours between games, and team travel schedules and television

schedules must be taken into account. The analysis assumed that the critical weekday afternoon game would start by 12:35 p.m. so that the game would likely be over by 3:30 p.m. (It is assumed that the comment that asked about weekend p.m. peak at 4:30 - 5:30 was misquoted and meant weekday.) A suggested improvement measure in the EIR recommends that the Giants schedule some games to start in the 3:30 - 4:00 p.m. time period so that these games would begin and end outside the peak commute period (p. V.44). This measure is feasible, but subject to League rules of how the games before and after this game would be scheduled.

As the Giants cannot control the length of a game, there is no way of knowing if and when a 12:35 game might extend longer. Based upon the Giants' actual experience in the 1994 and 1995 seasons, 88 percent of all games ended in 3-½ hours or less. This represents about two of 13 weekday afternoon games during the year. It is probable that two to four weekday afternoon games and occasional other, non-baseball events per year might extend into the 4:30 - 5:30 p.m. period. The transit impact analysis already examined the impacts of this "worst-case" situation, as explained on p. IV.176 of the EIR, by including the p.m. peak commute loads as the baseline to which ballpark transit demand was added. Also as noted in the EIR, the bus bridge and MMX extra ballpark service, if extended into the peak, could result in some systemwide capacity reductions (see p. IV.189).

As noted in the EIR (p. IV.103) large special events that might end during the p.m. peak period would result in substantial transportation impacts. The occasional weekday special event with a sell-out or smaller attendance that extended beyond its 3:30 - 4:00 p.m. scheduled end time would also result in substantial increases in congestion during the afternoon peak commute period. For example, intersections along The Embarcadero south of Howard Street would likely be more congested, as would intersections near the Pennsylvania/Mariposa Street ramp to I-280 southbound. Some intersections that are shown in the EIR analysis for a weekday afternoon ballgame to deteriorate to LOS E or F would be LOS D or better during an ordinary commute but would combine with those that are already at LOS E or F on a normal commute day, resulting in a greater number of congested

intersections in the South of Market and South of Channel areas. Thus, the unusually long baseball game or other weekday afternoon event would increase transportation congestion beyond that generally experienced during the p.m. peak commute.

Arrival/Departure Assumptions

Comment

IV.76 - Analysis assumptions: One of the features of Camden Yards is picnic tables inside the park to accommodate persons who otherwise might "tail-gate". Are any such spaces to be provided here? If yes, would this affect the arrival time of persons attending games?

Assumption that 80-85% of persons leave game in hour after game ends is not consistent with my own personal experience at Candlestick. If the team is playing poorly, people leave much earlier. If the game is dragging, they leave earlier. If the weather is a problem, they leave earlier. I would be surprised if 25% of the crowd was still there at the end of several long, late night games I have attended, vice the Croix de Candlestick. So how realistic is this assumption? (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The assumption that 80 to 85 percent of the ballpark patrons would leave the game in the hour after the game ends was based upon observations by WSA at 3Com Park and information provided by the Giants. In actual practice, the circumstances during a specific game will influence departure patterns. It is likely that during longer than average games, more ballpark patrons would leave early. A game where one team is way ahead of another, or where the weather is poor could also result in more early departures. The 80 to 85 percent assumption is based upon an average length game where the score is reasonably close, which represents most games. In general, any situation which causes the departure pattern to spread out would result in reduced impacts. For example, even an afternoon game which extends into the p.m. peak commute period would likely have some tempering of the impact due to ballpark patrons who leave early because of the length of the game, their need to get to another destination, or their desire to avoid the traffic and the peak transit crowds.

The Giants have not indicated any plans to provide on-site picnic facilities, either inside or outside the park. The South Beach Park would, however, offer this opportunity. The arrival/departure patterns used in the analysis already assume a degree of "tail-gate parties" no additional effect would be expected.

Sensitivity Analysis

Comment

IV.100, Sensitivity Analysis: The mode split and auto occupancy assumptions are critical to the analysis. There should be some sensitivity analysis of both of these variables. (Diane Nygaard)

Response

The purpose of a "sensitivity analysis" is to test the effect of a change in one or more of the key assumptions on the outcome of the analysis.

It is correct to state that the mode split and auto occupancy assumptions are key inputs into the determination of the transportation impacts of the ballpark. The two assumptions combined determine how many vehicles would be driven to a game and how many parking spaces would be needed to serve the demand. It is important to understand that the estimates of mode split were based both on the potential market demand for transit given the known availability of transit services and the known availability and price of parking. Similarly, the auto occupancy assumption was based on consideration of existing occupancy characteristics at 3Com Park and the experience of other downtown ballparks. As a result, it is reasonable to expect that the actual experience when the ballpark opens would be similar to that expected with the mode split and auto occupancy assumptions used in the analysis.

The greatest impacts in terms of traffic and parking would occur after a weekday afternoon. game. An auto occupancy of 2.7 persons per vehicle and a mode split of 30 percent was assumed for this condition. If the auto occupancy were to decline to 2.5 persons per vehicle and the mode share was to decline to 25 percent, the number of vehicle trips after the game

would increase by 1,400 or 17 percent. The demand for parking would also increase by this amount. While this is a substantial increase, it would not likely change substantially the characterization of the impacts as defined in the EIR for the weekday afternoon ballgame. As shown in Table IV.E.38 of the EIR (p. IV.207), weekday afternoon games, assuming a sell-out, would have a parking shortfall of 2,580 spaces, which would already be a substantial impact in the area. If 1,400 more cars were added to this deficit, which would total almost 4,000 cars, then the deficit would be worse. The result of either scenario would be that 2,580 to 4,000 ballpark patrons in cars would not be able to find parking within a reasonable walking distance of the ballpark.

It is also important to note that the constraints imposed by the available transportation resources would tend to control the resulting transportation characteristics. If fewer ballpark patrons decide to use transit and drive, the availability of parking would be less, and the price of parking would likely increase. This is likely to result in a shift back to transit and an increase in auto occupancy. If too many people try to use transit, crowding and long delays could result. This in turn, if not corrected by the transit operators, would tend to result in a drop in transit mode split and increased auto use.

Traffic

Comments

(IV.76) No attempt was made to quantify the extent to which existing traffic would divert to other routes. Why not? This will seriously impact side streets south of the site and especially the residential area of Potrero Hill. (Mariuccia Iaconi)

IV.81, Assumed Roadway Improvements: Closing of Berry Street as proposed by Catellus should be assumed so that the impacts of this change can be assessed. If these changes are significant then a mitigation could be added to not close this roadway segment. (Diane Nygaard)

Lacking Analysis of Reasonably Foreseeable Impacts: The conclusion of the effectiveness of the only offered Transportation Mitigation Measure is flawed. This mitigation measure does not account for the planned permanent closing of Berry Street between Fourth and Sixth in the development of Mission Bay North by the Catellus Development Corporation. Again,

this must be discussed since the development of Mission Bay North is not speculative nor uncertain. (David P. Cincotta, representing China Basin Landing, Ltd.)

Our proposed traffic and circulation plans for the North of Channel Mission Bay site call for Berry Street to be vacated from Fourth Street to Sixth Street. Fourth Street would be closed to vehicular traffic and would likely provide pedestrian/bicycle access. The draft EIR assumes that Berry Street will remain open through the previously mentioned road segments. We request that additional analysis be undertaken to determine the impacts, if any, based on the closing of a portion of Berry Street. (Donald M. Parker, Vice President, Catellus Development Corp.)

Access at 7th Street and Owen Street: It is unclear in the DEIR whether Owen Street is assumed to provide a connection to 7th Street in the vicinity of the Channel. If the DEIR has made assumptions regarding a connection to 7th Street, then additional analysis should be undertaken that does not include this connection; as that Catellus does not propose such a connection as part of the project. (Donald M. Parker, Vice President, Catellus Development Corp.)

Illinois Street: It is not explicitly stated in the DEIR how Illinois Street will be configured in the future. The graphic depiction in the DEIR suggests that Illinois Street will connect from south of Mariposa Street to 4th Street to the north and that the street will be used to accommodate ballpark traffic. We would request that additional traffic analysis be performed to assume that Illinois Street connect only as far north as 16th Street. (Donald M. Parker, Vice President, Catellus Development Corp.)

Response

As noted on p. IV.76 of the EIR, the methodology used to analyze traffic impacts assumes that existing traffic volumes would remain on their present travel routes during the time period before and after ballpark events. This is a conservative assumption, because it is likely that some existing drivers would divert to other travel routes or modes in order to avoid ballpark traffic. As such, this assumption results in higher (worst case) traffic levels at the study area intersections. At some intersections where this assumption results in poor traffic conditions, one of the likely impacts is the diversion of non-ballpark traffic to other routes. Because numerous other routes are available to non-ballpark traffic, and because it is impossible to predict with a reasonable degree of certainty which routes various drivers might use (e.g. some may use I-280 to 19th Avenue on the west side of the City) the EIR analysis does not reallocate existing traffic to "make room" for ballpark-bound cars. One possible diversion of non-ballpark traffic is addressed in Chapter V of the EIR, where a

traffic routing plan is proposed to provide alternative routes for drivers trying to avoid the traffic due to the ballpark. One important goal of the traffic routing plan is to prevent diverted traffic from using streets through residential areas.

Berry Street Closure. As noted in the comments, the traffic analysis assumed that Berry Street would remain open between Fourth and Sixth Streets. The conceptual plan prepared by Catellus Development Corporation indicates the planned closure of that portion of Berry Street as part of its Mission Bay North of Channel project. As of this date, however, the City and County of San Francisco has not agreed to the street closure. For that reason, the work scope for the ballpark EIR transportation analysis as approved by the City stated that Berry Street should be assumed to be open. Nonetheless, an analysis of the impacts of the closure is provided in Traffic Impacts, *Berry Street Closure*.

Access to Seventh Street. The 1991 *Mission Bay Specific Plan* assumed a circulation system which included a new roadway connection between Owens Street and Seventh Street, located a short distance south of the Channel. This connection would extend under the I-280 structure and cross the CalTrain tracks at-grade. The ballpark EIR traffic analysis did not assume this connection for either the existing-plus-project condition or the existing-plus-cumulative traffic condition. This is because the level of development currently assumed for Mission Bay South of the Channel in the ABAG *Projections 96* is much less than that proposed in the 1991 plan, reducing the need for traffic improvements. The connection between Owens and Seventh Streets was assumed for the second cumulative scenario, the UCSF/Mission Bay 2015 cumulative scenario, because this scenario was more consistent with the 1991 Mission Bay Plan in terms of the total magnitude of development proposed. This connection between Owens and Seventh Streets would be used mostly by local traffic in the Mission Bay/UCSF area. There would not be any substantial time-saving advantages for non-Mission Bay traffic to use this connection street. The conceptual plan prepared by Catellus Development Corporation also includes this connection.

The *1991 Mission Bay Plan* also included a northward extension of Owens Street across China Basin Channel to Berry Street. The connection was termed the "Owens Street Bridge." This connection also was included in the UCSF/Mission Bay 2015 Cumulative scenario, but not in the other EIR scenarios. The Owens Street Bridge is not a part of Catellus' current concept plan for Mission Bay. The modifications that have occurred to the I-80 freeway structure as part of the seismic retrofit project have reduced the area under the freeway for this bridge to be constructed, and it may no longer be practical.

Illinois Street. The traffic analysis assumed that Illinois Street would remain open between 16th Street and Mission Rock Street. The preliminary traffic routing plan described in Chapter V of the EIR assumed that traffic approaching the ballpark parking lots from the south via Third Street, Mariposa Street, or 16th Street would use Third Street and either Illinois Street or Terry A. Francois Boulevard to access the parking. The plan includes temporary improvements to allow both Illinois Street and Terry A. Francois Boulevard to be used as access routes to and from the parking lots. These improvements would be in the form of traffic cones, portable signs, and pavement markings which would delineate the access route and lanes into the parking areas. If this section of Illinois Street were to be closed by the development of Mission Bay, then Terry A. Francois Boulevard would be adequate for this purpose. As noted in the EIR, four lanes would be required on Terry A. Francois Boulevard, which is consistent with the most current conceptual plan for Mission Bay south of the Channel. The dedicated parking lots should be designed in a way such that ballpark vehicles would be able to access more than one lot from any access route, and vehicles would not have to wait on a particular street to access the larger lots. As described in Chapter V of the EIR, if mitigation measures were put in place, parking lot attendants and Parking Control Officers (PCO's) would be stationed at the intersections of Mariposa Street at Third Street and Terry A. Francois Boulevard to distribute ballpark traffic according to the rate each parking lot is occupied. Please refer to the discussion in "South of Channel Waterfront Uses - Terry A. Francois Boulevard" for more detailed discussions on Terry A. Francois Boulevard.

Transit Assumptions

Comments

IV.180, Transit Capacity: Please clarify if capacity assumes seated load or if not, what load factor was used. (Diane Nygaard)

IV.85, Transit Improvements Completed 2000-2015: MUNI light rail service along 3rd Street is not fully funded at this time. The analysis should look at impacts both with and without this light rail expansion.

It is unclear from the discussion if there was any change in mode split, or traffic patterns assumed from the downtown extension. This needs clarification. (Diane Nygaard)

Ballpark departure times do not consider patronage of commercial areas: The discussion on p. IV.76 states that "...80 to 85 percent of departures would occur in the hour following the game." According to the footnote, this is based on field surveys taken between April and August 1996 at 3Com Park. The analysis concludes that the project's impacts on transit services will be minimized because ballpark patrons will have departed before the peak commute period begins. Because of the extensive commercial services planned for the ballpark, the 3Com Park departure characteristics are not directly comparable. The ballpark's commercial merchants will undoubtedly attempt to keep fans in the area longer. While this will spread out the ballpark patrons' departures from the area, it will cause many patrons to depart San Francisco during the peak commute period, a time at which BART is effectively operating at capacity. (Karita Zimmerman, Manager, Environmental Compliance, BART)

CalTrain Downtown Extension (Page IV.86): This section discusses the effect of the proposed CalTrain Downtown Extension on accessibility to the ballpark. Yet it is unclear whether the DEIR analysis assumes the construction of the CalTrain Extension or not. As noted in the analysis, the extension of the CalTrain service would make travel to and from the ballpark somewhat less convenient. The inclusion or exclusion of the extension could affect BART patronage. This section should state whether the analysis assumes the extension of the CalTrain to downtown.

A related issue arises in the discussion of the CalTrain service (p. IV.196). If the CalTrain is extended downtown, will CalTrain continue its skip-stop service of certain trains stopping at certain stations? If so, how will ballpark patrons know which train to board to get to the ballpark? (Karita Zimmerman, Manager, Environmental Compliance, BART)

Full project scenario is not defined: Project sponsors cannot assure that the proposed support transportation systems and mitigations for the stadium—such as ballpark bridge buses and 4-car trains on the MMX line—will be provided. Most of the traffic mitigations are unfunded. Therefore, one could assume that these mitigations or services may not occur and the

potential impact to BART has not been fully assessed. (Karita Zimmerman, Manager, Environmental Compliance, BART)

Project Impacts (p. IV.180) - Table IV.E.29, under Southeast and South of Market Screen lines includes 80X, 81X, 82X, and MMX with an 88% use ratio shown. Rt. 81X is assumed to be replaced by MMX. MUNI and JPB have yet to finalize service levels for MMX and 80X, 82X. Service on 80X & 82X may be reduced based on actual demand. Tables IV.E.30-31 also raise similar concerns and issues.

Bus Bridge and MUNI Extension (p. IV.185) - CalTrain endorses the Bus Bridge concept. We agree service reliability is critical and we look to efforts to improve CalTrain Express 80X & 82X service along with other MUNI routes that service the 4th/Townsend Station. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

p. IV.180, Table IV.E.29 - Worst Case Post-game Impacts on Muni by Screenline - Line 32 will be "shortened" to Mission Street with the start-up of the MMX. Lines 80X, 81X and 82X will also be altered with the start-up of the MMX - we also note that they offer express service to the CalTrain Station during the PM peak only and not the reverse. (Peter Straus, Manager of Service Planning, Muni)

DEIR states (page IV.83) ferry service for the project scenario (Year 2000) is assumed to be "consistent with current schedules". A fourth vessel for San Francisco/Larkspur service is currently under construction. DEIR should clarify that this additional vessel will increase frequency between San Francisco and Larkspur in early 1998. Although the exact schedule of this additional service is not currently known, future weekday departures from San Francisco could be as late as 10 p.m. (Jerome M. Kuykendall, Director of Planning and Policy Analysis, Golden Gate Transit)

Transit Improvements (p. IV.83) - On July 6, 1997 CalTrain will expand service by 6 weekday and 2 Saturday trips. Except for the Giants, CalTrain would not add future service at times associated with evening weekday games. However, in order to accommodate expected game attendees in a manner similar to San Jose Arena events, CalTrain plans to operate a post-game train with reasonable capacity after each game where there is no regularly scheduled train. It will be necessary for any such service pattern to cover at least incremental operating costs.

Effect of Proposed CalTrain Downtown Extension (DTX) (p. IV.86 & 87) - Please note that Townsend Street south alignment for DTX would provide a third track that could be used to stage a train for Ballpark patrons. This would alleviate some of the impact of a "through" station.

In addition, while not a requirement of the DTX, under an Extension scenario, it is likely that CalTrain would operate more service, which would improve frequencies to China Basin. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

Transit Capacity. The capacities per vehicle used in the MUNI transit analysis on pp. IV.176 - IV.194 are based on design standards used by MUNI Planning, which are 45, 63, 94 and 119 passengers respectively for 30-,40-, 60-ft. buses and LRVs. These capacities include all seats and a certain number of standees based upon the open floor area of the vehicle. They are planning-level design capacities and do not represent the absolute maximum crush load capacity of the vehicle. Each transit operator provided similar capacity standards for use in the analysis as is documented in Chapter III of the *San Francisco Giants Ballpark at China Basin Transportation Background Report*.

Third Street Light Rail. The Third Street Light Rail Project was assumed to be implemented by the year 2015, and as such was included in the Cumulative-Plus-Project scenario. It was not included in the Existing-Plus-Project Scenario. Current MUNI planning efforts indicate that the project could be implemented by the year 2002-2003. There are funds available for this project. It is not clear if the funds available for the project will be sufficient to fund the full extension at this time. As noted on p. IV.181 of the EIR, the Third Street Light Rail project is not expected to have a substantial impact on transit use to ballpark events. One key reason for including the Third Street Light Rail in the cumulative scenario was to evaluate the impact of the light rail right-of-way on traffic conditions on Third and Fourth Streets.

Departure Times. As noted in the comment the transit analysis assumed that 85 percent of the ballpark patrons using transit after a weekday afternoon game would depart in the hour after the game. It was assumed that the remaining 15 percent would be persons departing before the game ended and persons staying at the ballpark or at other nearby commercial uses. In general, it was assumed that any spreading out of the departure pattern over a longer period would be beneficial. While some ballpark patrons might end up staying in the area over an hour and then seeking transit during the 4:30 - 5:30 p.m. peak commute period, most would likely still leave the area in one hour and some would likely stay in the area for several hours for dinner, shopping, or other entertainment. As a result the flow of these

l:e-staying ballpark patrons is likely to be well spread out over a period of several hours (ring the game.

I was also assumed that ballpark patrons who use regional transit will learn to adjust to the] tterns of transit availability. Ballpark patrons leaving once during the peak commute hour r ay find that it is better to leave earlier or to stay in the area longer.

(alTrain. The transit analysis does not assume the implementation of the CalTrain I)wntown Extension because of the uncertainty surrounding this project. The assumption u ed in the analysis is that the CalTrain station will remain at Fourth Street. If the extension v re implemented, this station is proposed to move to between Fifth and Sixth Streets, or c e block further from the ballpark. The station would still be close enough to the ballpark t allow ballpark patrons to walk to and from the station. As noted in Transportation A sumptions, *Mode Split*, last paragraph, the CalTrain JPB has adopted a resolution e pressing CalTrain's commitment to providing service for ballgames. If with the extension t ins were scheduled to skip the Fifth Street Station, special scheduling would be needed for b llgame days to allow all trains likely to serve ballpark patrons to arrive and depart from t e station at Fifth Street.

C p. III.69 of the EIR under the topic "CalTrain" the follow sentence has been added at the b ttom of the page:

> **CalTrain will expand service by six weekday and two Saturday trips on July 6, 1997.**

C p. IV.83 of the EIR the first bullet item has been expanded with the following:

> **CalTrain would add a late night train on game days only, to coincide with the end of weekday night ballgames, ~~and would add cars as needed to existing scheduled trains to serve ballpark patrons before and after ballgames~~. CalTrain plans to operate a post-game train with reasonable capacity after each game where there is no regularly scheduled train. It will be necessary for any such service pattern to cover at least incremental operating costs.**

Response

Transit Capacity. The capacities per vehicle used in the MUNI transit analysis on pp. IV.176 - IV.194 are based on design standards used by MUNI Planning, which are 45, 63, 94 and 119 passengers respectively for 30-,40-, 60-ft. buses and LRVs. These capacities include all seats and a certain number of standees based upon the open floor area of the vehicle. They are planning-level design capacities and do not represent the absolute maximum crush load capacity of the vehicle. Each transit operator provided similar capacity standards for use in the analysis as is documented in Chapter III of the *San Francisco Giants Ballpark at China Basin Transportation Background Report*.

Third Street Light Rail. The Third Street Light Rail Project was assumed to be implemented by the year 2015, and as such was included in the Cumulative-Plus-Project scenario. It was not included in the Existing-Plus-Project Scenario. Current MUNI planning efforts indicate that the project could be implemented by the year 2002-2003. There are funds available for this project. It is not clear if the funds available for the project will be sufficient to fund the full extension at this time. As noted on p. IV.181 of the EIR, the Third Street Light Rail project is not expected to have a substantial impact on transit use to ballpark events. One key reason for including the Third Street Light Rail in the cumulative scenario was to evaluate the impact of the light rail right-of-way on traffic conditions on Third and Fourth Streets.

Departure Times. As noted in the comment the transit analysis assumed that 85 percent of the ballpark patrons using transit after a weekday afternoon game would depart in the hour after the game. It was assumed that the remaining 15 percent would be persons departing before the game ended and persons staying at the ballpark or at other nearby commercial uses. In general, it was assumed that any spreading out of the departure pattern over a longer period would be beneficial. While some ballpark patrons might end up staying in the area over an hour and then seeking transit during the 4:30 - 5:30 p.m. peak commute period, most would likely still leave the area in one hour and some would likely stay in the area for several hours for dinner, shopping, or other entertainment. As a result the flow of these

late-staying ballpark patrons is likely to be well spread out over a period of several hours during the game.

It was also assumed that ballpark patrons who use regional transit will learn to adjust to the patterns of transit availability. Ballpark patrons leaving once during the peak commute hour may find that it is better to leave earlier or to stay in the area longer.

CalTrain. The transit analysis does not assume the implementation of the CalTrain Downtown Extension because of the uncertainty surrounding this project. The assumption used in the analysis is that the CalTrain station will remain at Fourth Street. If the extension were implemented, this station is proposed to move to between Fifth and Sixth Streets, or one block further from the ballpark. The station would still be close enough to the ballpark to allow ballpark patrons to walk to and from the station. As noted in Transportation Assumptions, *Mode Split*, last paragraph, the CalTrain JPB has adopted a resolution expressing CalTrain's commitment to providing service for ballgames. If with the extension trains were scheduled to skip the Fifth Street Station, special scheduling would be needed for ballgame days to allow all trains likely to serve ballpark patrons to arrive and depart from the station at Fifth Street.

On p. III.69 of the EIR under the topic "CalTrain" the follow sentence has been added at the bottom of the page:

> **CalTrain will expand service by six weekday and two Saturday trips on July 6, 1997.**

On p. IV.83 of the EIR the first bullet item has been expanded with the following:

> **CalTrain would add a late night train on game days only, to coincide with the end of weekday night ballgames, ~~and would add cars as needed to existing scheduled trains to serve ballpark patrons before and after ballgames~~. CalTrain plans to operate a post-game train with reasonable capacity after each game where there is no regularly scheduled train. It will be necessary for any such service pattern to cover at least incremental operating costs.**

On p. IV.87 of the EIR under the second bullet item, the third line has been revised:

> **...containing ~~only 2 tracks (one inbound, the other outbound)~~ three tracks rather than 12.**

On p. IV.87, second bullet, in the eighth line, the following sentence has been revised:

> **At the proposed new station, up to two trains could be staged at once, if the third track is used as a staging track.**

MUNI. The MUNI Metro Extension (MMX), at four cars per train is identified as a mitigation measure for the project on p. V.40 of the EIR. The project sponsors are working on an agreement with MUNI and the other involved parties to assure that the service as defined would be provided.

Table IV.E.29, on p. IV.180, has been corrected to note that with the implementation of the MMX light rail service, MUNI lines 32, 80X and 81X would not pass the Southeast screenline. This will reduce the transit capacity at this screenline somewhat. The Southeast screenline was shown to have ample capacity, and would continue to do so with this change. Tables IV.E.30 and IV.E.31, pp. IV.182 and IV.184 have been corrected by deleting the inappropriate lines; capacities and other calculations had already been corrected and do not need further revision.

Ferry Service. A statement has been added to the last bullet item on p. IV.83 of the EIR:

> **By the year 2000, Golden Gate Transit will have added a new ferry to the Larkspur/San Francisco run. Although this ferry could depart San Francisco as late as 10:00 p.m., it does not appear it would remain late enough to serve week night ballgames.**

TABLE IV.E.29
Worst Case Impact on MUNI and Streetcars by Screenline Locations – 1996 with Project Weekday Post-game Departures Coinciding with Commuter Peak (4:30-5:30 PM)

Screenline	MUNI Routes	Hourly Capacity[1]	Existing Hourly Load	Added Ballpark Trips	Load with Ballpark Trips	Existing Percent Capacity Utilized	Percent Capacity Utilized with Ballpark
Northeast	15 (ib)[2], 30 (ib), 30X (ob)[2], 32 (ib), 42 (ib), 45	4,222	2,081	674	2,755	49%	65%
Northwest	1, 2, 5, 21, 31, 38, 38L	4,501	3,684	319	4,003	82%	89%
Southwest	6, 7, 12, 14, 66, 71, F, J, K, L, M, N	9,504	6,329	1,463	7,792	67%	82%
Southeast	9, 14X, 15 (ob), 30 (ob), 32 (ob), 42 (ob), 80X, 81X, 82X	*3,950*	*2,259*	*429*	*2,688*	*57%*	*68%*
South of Market	15, 30, ~~32~~, 42, 45, ~~80X 81X~~, 82X, MMX, bus bridge	*12,141*	*1,836*	*9,226*	*11,062*	*15%*	*91%*

Notes:
1. Capacity based on published MUNI timetables, Fall 1996, and may not include the effect of missed or late runs.
2. ib = inbound; ob = outbound
Source: Telephone conversations with David Makofsky, MUNI schedules, Data Service, January 2, 1997; and Wilbur Smith Associates.

On p. IV.73 of the EIR this statement has been added to the paragraph on Golden Gate Transit ferry services:

> **In 1998 Golden Gate Transit will add a new ferry to the San Francisco/Larkspur run. Although the exact schedule is not known at this time, this ferry could make weekday departures from San Francisco as late as 10:00 p.m.**

Special Events

Comments

We know, for instance, -- the EIR even says it -- that the attendance at these events could be because they can seat people down in the ball field -- 25 percent more than a full house baseball game. We know also the people who come to these concerts will not be the same --

won't have the same practice at it as the people who come to ball games over and over and know where to park and know how to walk and that sort of stuff. Many times it will be people coming for the first time. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

Page IV.75, Attendance: Transportation analysis is based on an assumption that the maximum ballpark attendance will be 39,500. However, if non-baseball events with a capacity of 50,000 will occur on a regular basis, the entire transportation analysis must be based on that number of attendees. (Steven L. Vettel, Residential Properties Group)

I am very concerned about the traffic and parking problems that I feel are not addressed in the draft EIR of the Giants ballpark. One little particular section, which will just take a second to read, Section 4, Page 127, "Other ramps, as noted above, the impacts of the project will include increased traffic on I-280 and West 101, and on the on ramps and off ramps serving these freeways in the study area during hours before and after ballgames. One potential result of this increased congestion and delay would be an increased incentive for traffic to use neighborhood streets in the vicinity of the ramps at Vermont, Mariposa, Pennsylvania, and Cesar Chavez Streets." First of all, we are not talking about only 80 ballgames per year. We have to add on five major city events of 50,000 people per event, perhaps, and 30 to 40 concerts in the stadium amphitheater, or 128 events per year. (Sandra Peterson)

There are an undefined number of ballpark events beyond the scheduled Giants games which would add to transit impacts and are not accounted for. (Karita Zimmerman, Manager, Environmental Compliance, BART)

Page IV.103, Non-baseball events: The impacts of a 50,000 person event need far more analysis than simply that they "would be up to 25 percent greater." If the Giants propose to use the ballpark regularly for such major events, a new transportation analysis must be performed. The DEIR justifies not performing such an analysis by assuming that these events would be infrequent, however, the Giants have not agreed to a numerical limit on these events. Until they do so, this assumption cannot be made. (Steven L. Vettel, Residential Properties Group)

Page V.46: It is inaccurate to say that special events would be infrequent when the DEIR recommends no limit on the number of such events. The transportation impacts of these events can be considered insignificant only if there are only a very few such events per year. (Steven L. Vettel, Residential Properties Group)

Page VI.2, Freeways: Limiting the number of full facility non-baseball events would mitigate the significant impacts on freeways and freeway ramps by reducing the number of times per year when the freeways and ramps would be adversely affected by the ballpark. (Steven L. Vettel, Residential Properties Group)

Response

In addition to ballgames, the project sponsor has provided clarification that there could be other types of events. There could be up to five maximum-capacity events (seating approximately 50,000 people or more) and an additional 20 open-air events seating from 15,000 to 42,000 people. Additional smaller open-air events could also be held. From 30 to 40 music events could also be held in a temporary enclosed amphitheater inside the ballpark, seating from 5,000 to 15,000 people. (See Project Description, Type and Number of Events.)

As indicated on p. IV.104 of the EIR, a large special event with 50,000 in attendance would have impacts greater than a sellout ballgame. This would be particularly true if the event were held on a weekday afternoon. In addition, if a weekday afternoon event were to end during the commute peak or an evening event were to start during the evening commute peak, substantial impacts would occur. The research of other downtown ballparks and sport stadiums indicates that such large maximum-capacity events are unusual. Coors Field in Denver has never had such an event, for example. Also when such events do occur, the nature of the event is typically such that it occurs on a weekend. It is clear that such large special events, if they were to occur at the ballpark, would require special treatment. The approach to dealing with the impacts of such events would likely vary with the nature of the event. A rock concert is likely to attract a different group of people with different transportation characteristics than a visit from a prominent figure or a Fourth of July celebration. The most reasonable way to address the impacts of such events is to deal with each event on an individual case basis.

Events that are smaller than a sellout ballgame would have lesser transportation impacts than those associated with a ballgame. The exception to this would be if the event were to end or begin during the peak commute period.

Events at the ballpark which would have a smaller attendance than the 39,500 persons associated with a sellout ballgame would include ballgames with less than a sellout crowd

and the other non-ballgame events that could occur as noted earlier. The impacts of a smaller event would be similar to those associated with a sellout ballgame, but would be smaller or lesser in scale. For example, the number of impacted intersections would be less, and the demand for transit and parking would be less. As the impacts of smaller events would be less, the extent of the mitigation required would also be less.

As noted on p. V.5 of the EIR, it would be the pedestrian flows on the Lefty O'Doul Bridge that "trigger" the need for the mitigation program including the traffic routing plan. This is because, when the number of pedestrians crossing the bridge exceeds the capacity of the sidewalks, pedestrians would likely spill onto the roadway to bypass the congested sidewalks. When this situation would occur the bridge would need to be closed and the traffic routing plan put in place. Review and approval by the City's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) would be necessary to close streets before and after special events.

The capacity of the bridge sidewalks is approximately 5,000 persons per hour. Flows above this level would result in congestion on the sidewalks. If all the assumptions about parking distribution, transit use, and travel distribution developed for the sellout game stayed the same for a smaller event, a crowd of 19,000 persons would be the level that would put 5,000 ballpark patrons per hour on the bridge. However, it is unlikely that all these assumptions would be constant. With a smaller crowd, people could be expected to try and leave the ballpark sooner, to take advantage of the available parking, and not to use transit as much. The result would be a larger proportionate number of persons using the bridge. Potentially events with attendance in the range of 5,000 to 9,000 persons would generate pedestrian flows across the bridge that would exceed the capacity of the sidewalks for at least fifteen minutes. Thus, even events of this size would trigger a need for the mitigation program, although it could be scaled down somewhat. Even very small events, less than 5,000 persons, would require the use of crowd controls and PCOs, at least at the King Street intersections near the ballpark.

The EIR text has been corrected to reflect the consideration of events other than ballgames which would occur at the ballpark. On p. IV.77, the following text has been inserted after the first full paragraph.

In addition to ballgames, there could be other types of events including the following:

- **up to five maximum-capacity events (approximately 50,000 persons or more);**
- **up to 20 other open-air events (15,000 to 42,000 persons);**
- **additional smaller open-air events (fewer than 15,000 persons); and**
- **from 30 to 40 music events in a temporary enclosed amphitheater inside the ballpark (5,000 to 15,000 persons)**

The project sponsor has agreed that when these events occur on a weekday they would not be scheduled to end after 4:00 p.m. or begin before 7:30 p.m. These events could occur on weekdays or weekends. Except for the maximum-capacity events, the impacts of the other events would be similar to those of a ballgame. For more discussion of this issue see the section on Special Events in this section (IV.E).

On p. IV.77, the following text has been inserted in the second full paragraph before the last sentence:

The Giants have agreed that all other non-baseball events would be scheduled to end before 4:00 p.m.; however, occasionally an event could run longer than expected, which would create transportation impacts in the peak commute period.

Table IV.E.1 on p. IV.78 has been changed as follows:

Replace the column heading "**Game**" with "**Scenario**", and under the column "Approx. number per year" add to the number of games (13, 42, 26) a table footnote: **Baseball games only; a number of non-baseball events could also occur in these general time periods.**

On p. III.99, the second sentence of the last paragraph has been deleted.

On p. IV.91, after the first full paragraph the following text has been added:

> **As has been noted there would also be a number of other non-baseball events at the ballpark. All of these events would be similar to or smaller than a sellout game, with the exception of up to five maximum-capacity events which could have approximately 50,000 attendees.**

On p. IV.116, the last sentence of the first paragraph under "Existing-plus-Project" has been deleted.

On Table IV.E.13, p. IV.117 table footnote "1" has been deleted and the other notes renumbered accordingly.

On Table IV.E.15, p. IV.122 table footnote "1" has been deleted.

On p. IV.124 in the first paragraph, fifth sentence the phrase "**which would happen approximately 13 times per year**" has been deleted.

On Table IV.E.17, p. IV.125 table footnote "2" has been deleted and the other notes renumbered accordingly and the first sentence on this page has been deleted.

On Table IV.E.19, p. IV.132 table footnote "2" has been deleted and the other notes renumbered accordingly.

On Table IV.E.21, p. IV.136 table footnote "1" has been deleted and the other notes renumbered accordingly.

On Table IV.E.23, p. IV.143 table footnote "1" has been deleted.

On Table IV.E.25, pp. IV.146 - IV.149 table footnote "2" has been deleted on each page.

On p. IV.150, the EIR text has been changed to delete "**approximately 13**" from the first

sentence in the second paragraph.

On Table IV.E.27, p. IV.169 table footnote "1" has been deleted.

On p. IV.205, the first sentence in the last partial paragraph has been deleted.

On p. IV.209, under the section "Weekday Afternoon Games" the phrase "**which occur approximately 13 times a year**" has been deleted from the first sentence.

On p. IV.214, the phrase "which occur about 13 times a year" has been deleted.

On p. V.2, at the end of bullet item "1" the following text has been inserted:

...including the following:

- **up to 20 open-air events (15,000 to 42,000 persons);**
- **additional smaller open-air events (fewer than 15,000 persons); and**
- **30 to 40 music events in a temporary enclosed amphitheater (5,000 to 15,000 persons)**

The project sponsor has agreed that when these events occur on a weekdays they would not be scheduled to end after 4:00 p.m. or begin before 7:30 p.m. These events could occur on weekdays or weekends. Except for the maximum-capacity events, the impacts of the other events would be similar to those of a ballgame.

In Table V.B.1, pp. V.19 - 24 table footnote "2" has been deleted and the other notes numbered accordingly on each page.

In Table V.B.3, pp. V.35 - V.38 table footnote "2" has been deleted and the other notes numbered accordingly on each page.

On p. V.47, the following text has been inserted after the first partial paragraph:

There would be non-baseball events at the ballpark which would have a similar or smaller attendance than the 39,500 persons associated with a sellout ballgame. These events would include ballgames with less than a sellout crowd and the other non-ballgame events that could occur as noted earlier. The impacts of a smaller event would be similar to those associated with a sellout ballgame, but would be smaller or lesser in scale. For example, fewer intersections would be impacted, and the demand for transit and parking would be less. As the impacts of smaller events would be less, the extent of the mitigation required would also be less.

As noted on p. V.5 of the EIR, it would be the pedestrian flows on the Lefty O'Doul Bridge that would "trigger" the need for the mitigation program including the traffic routing plan. This is because, when the number of pedestrians crossing the bridge exceeds the capacity of the sidewalks, pedestrians would spill onto the roadway to bypass the congested sidewalks. When this situation would occur, the bridge would need to be closed and the traffic routing plan put in place.

The capacity of the bridge sidewalks is approximately 5,000 persons per hour. Flows above this level would result in congestion on the sidewalks. If all the assumptions about parking distribution, transit use, and travel distribution developed for the sellout game were the same for a smaller event, a crowd of 19,000 persons would be the level that would put 5,000 fans per hour on the bridge. However, it is unlikely that all these assumptions would be constant. With a smaller crowd, people could be expected to try and leave the ballpark sooner, to take advantage of the available parking, and not to use transit as much. The result would be a larger proportionate number of persons using the bridge. Potentially, events with attendance in the range of 5,000 to 9,000 persons would generate pedestrian flows across the bridge that would exceed the capacity of the sidewalks for at least fifteen minutes. Thus, even events of this size would trigger a need for the mitigation program, although it could be scaled down somewhat. Even very small events, less than 5,000 persons, would require the use of crowd controls and PCOs, at least at the King Street intersections near the ballpark.

On p. I.18, the first full sentence in the first full paragraph has been revised as follows:

<u>To account for ballgames and other events which could begin or end at similar times,</u> the traffic impacts analysis for the ballpark project was carried out for four time periods to account for different baseball game times: after weekday afternoon games (3:30 - 4:30 p.m.), assuming a 12:35 p.m. start time; before and after weekday night games (6:30 - 7:30 p.m. and 10:30 - 11:30 p.m.) assuming a

7:35 p.m. start time; and after weekend day games (4:00 - 5:00 p.m.) assuming a 1:05 p.m. start time, all assuming an average game length of 3 hours. All ballgame traffic analyses assumed a sold-out game, with 42,000 tickets sold and 39,000 fans in attendance (a conservative 6 percent "no-show" factor).

)n p. I.22, in the third sentence of the first paragraph under Freeway Ramps, delete "which re expected to be played about 13 times per year," and insert **or events** in its place.

)n p. I.25, delete "expected to occur about 13 times per year" from the parenthetical in the rst sentence, second paragraph under Arterials, and insert **(or events)**.

)n p. I.27, first sentence, last paragraph, delete "approximately 13 weekday events," and isert **or events** after "afternoon games."

he first full sentence on p. I.33 has been revised to read:

Therefore, ~~on the approximately 13 days per year that~~when weekday afternoon games ~~were played~~or other events occur, regular commute service on some lines might be somewhat delayed.

rip Generation/Parking Demand

)mments

I seems like most of the talk always turns around traffic. [Jean Neblett] said 9,000 cars. lowhere is there any talk about 9,000 cars coming to the ballpark. The Giants have gone t of their way to -- we have a public transportation system. They want to cooperate with the neighbors at South Beach and Potrero Hill. I cannot in any way see that there are ing to be 9,000 cars leaving or coming to any game. (Clayton Green)

Ie DEIR disassociates the ballpark from other commercial uses by stating that off peak and "ccasional" use of this facility does not result in significant impacts. The DEIR overlooks t: fact that the ballpark, used on 120 event days, will likely generate well over 4 million rson trips a year. By comparison, a 1.2 million square foot office building, during the c urse of 250 business days a year would generate only half as many trips. (Martin Fay, Fncon Point – South Beach CAC)

I just hope you're all taking seriously the concerns of us, the neighborhood, into account. In the beginning the crowds will come - to see the Giants - bringing along cars, trucks, motor homes. I really can't wait! Please figure out the mess that is coming!! But eventually as always the true Giant fans will stop coming - 10,000 folk watching a game on a good day. (Mark Erickson, Mark Erickson Studio)

Parking Demand/Transportation Impacts: The data in Table X.C.8, "Average Auto Occupancy Rates," includes the occupancy at 3Com Park and at other ballparks in various metropolitan areas. It breaks down the assumed occupancy for the Project by the time of the game. However, this breakdown is not completed for the other ballparks in the various metropolitan areas chosen. More importantly, the occupancy numbers reached as "Assumptions" for the new ballpark are a then to twenty percent increased leap over the number tracked at 3Com Park. These numbers also greatly exceed the majority of the occupancy rates at the other cities ballparks. This imprecise quantitative data on the occupancy rates makes the parking demand conclusion incorrect. (David P. Cincotta, representing China Basin Landing, Ltd.)

Looking beyond this, the 2430 space deficit figure would be much higher if it were not for three assumptions, the first being that 35% of normal street parking will be available for fans. Even more significant, though, is the assumption that the fan-base will change dramatically from one of die-hard North, South, and East Bay fans (19%), willing to drive in to 3Com to an equal percentage of downtown white-wine types who will suddenly acquire beer tastes.

Now, compound this with the assumption that vehicle occupancy rates of 2.51 fans per car at 3Com will jump to 2.7-2.9 for Pac Bell and you end up with assumptions that if wrong, will not only spell out environmental but financial disaster as well. Who picks up the tab then? (Silva B. Creg)

The following underlying questionable assumptions need additional documentation in the EIR..Three, auto occupancy rates will jump from 2.5 to 2.9 persons per vehicle. (Joel Ventresca)

Response

The transportation analysis resulted in the following estimates of fan vehicle trips for each game time scenarios for sellout games:

Weekday Afternoon Post-Game	-	7,940
Weekday Night Pre-Game	-	8,720
Weekday Night Post-Game	-	9,200
Weekend Day Post-Game	-	8,880

The trip generation of the ballpark is different from most other uses in that, as defined, the ballpark would generate little traffic during the peak commute hours and on the majority of the days of the year the ballpark would not generate substantial traffic. On most days of the year there would be no event-related traffic generated by the ballpark. It is not correct to say that because of these characteristics the traffic generation of the ballpark was somehow underestimated or not taken into account.

The auto occupancy rate is a key determinant of how many vehicles would drive and park for a ballpark event. Table X.C.8 on p. A.122 of the Appendices to the EIR presents the auto occupancy assumptions for the ballpark, which range from 2.7 to 2.9 persons per vehicle depending on the time of the game. It also presents auto occupancy data from 3Com Park and six other ballparks. The information can be grouped into two types of ballparks: ballparks in remote or suburban sites with ample parking, such as 3Com Park, Dodger Stadium, and Jack Murphy Stadium; and ballparks in more urban settings with constrained parking availability such as Coors Field, Fenway Park and Anaheim Stadium. Auto occupancies for the first group, ballparks like 3Com Park, ranged from 2.4 to 2.6 persons per vehicle. Auto occupancy for the second group, ballparks similar to the new Giants ballpark, ranged from 2.75 to 3.3 persons per vehicle. Thus, the assumptions used for auto occupancy are consistent with the national experience for urban ballparks. In fact, higher occupancies are achievable.

The auto occupancy and trip generation assumptions are key determinates of parking demand. The calculated demand was then compared with the supply that was determined to be available for each game time. During weekday afternoon games it was assumed that none of the on-street parking or private restricted (not available for general public use) off-street parking would be available. For night and weekend games, based upon the parking surveys, it was assumed that only about 35 percent of the available private restricted off-street parking would be available. Therefore, the assumptions about availability of parking are conservative and the 2,580-space deficiency for weekday afternoon events is reasonable.

The parking demand estimates are also sensitive to the number of downtown employees who would attend ballgames. Because many employees currently use public transit or already drive their cars and park in the 15-minute distance zone from the ballpark, they generate less parking demand than ballpark patrons traveling from remote residential locations. However, the employee population in downtown represents a cross-section of the region, including persons who reside in San Francisco, the North Bay, the East Bay, the South Bay and points beyond. The convenient location of the new ballpark for downtown workers, strongly indicates that increased attendance by this group would occur at the new ballpark as compared to 3Com Park.

Bicycling

BART Bicycle Policy

Comment

Clarification on BART bicycle policy: Page IV.222 discusses the BART policy for bicycles on BART trains. The demonstration project that began October 1, 1996 has concluded. The policies instituted during that time period remain in effect. Please note that during peak commute hours there are restrictions for bicycles even on the reverse commute. These include: both the 12th Street/City Center and 19th Street stations are off limits to bicyclist during peak and bicycle travel to San Francisco ends at the Embarcadero Station. BART personnel may refuse bicycle entry at any time due to crowded trains, platforms or unsafe conditions. The referenced capacities of 7 bicycles per car and/or 15-20 bikes on any one BART train may not be possible if conditions warrant. (Karita Zimmerman, Manager, Environmental Compliance, BART)

Response

It is acknowledged that the changes in bicycle access on BART described as a demonstration project on p. IV.222 of the EIR have since been made permanent. Specifically, permits are no longer required and passengers with bikes can access all cars but the first car during all hours that bikes are allowed on BART. It is also acknowledged that there are some restrictions for the reverse commute as described in the comment. The EIR text on p. IV.223, immediately following the first partial sentence at the top of the page, has been revised to reflect this new information with the following new text:

> **The demonstration program has concluded and the policies instituted during that time remain in effect. There are some restrictions to bicycle use in the reverse commute direction during commute periods. The downtown Oakland Stations are off-limits to bicyclists during the commute period and westbound bicycle travel to San Francisco in the afternoon peak ends at the Embarcadero Station. BART personnel may refuse bicycle entry at any time due to crowded or unsafe conditions.**

Bicycle Mode Split

Comments

Page IV.223, Bicycle parking: How close to the Lefty O'Doul bridge will the bicycle parking be located? Would locating bicycle parking on the ballpark site itself increase the projected numbers of fans arriving by bicycle? If so, it should be considered. (Steven L. Vettel, Residential Properties Group)

The EIR failed to take into account possible increases in bicycle use if certain improvements are made.

Because more than half of San Francisco residents own bicycles, and, according to two Harris polls in 1993 and 1994, more than half of bicycle owners would bike more often if there were safe routes to their destinations, the plan should have taken into account measures to improve bicycle access to the stadium.

For example, it is a major oversight that Chapter III (Environmental Setting) did not include a "Bicycle Study Area." The plan should have determined the number of people who live or work within a certain distance, by time, of the proposed ballpark. This EIR should answer the question: How many potential ballpark patrons live within a half-hour bike ride of the proposed ballpark? It should attempt to answer the question: How many people will be deterred from biking by dangerous, congested conditions, and instead drive cars or add to the crowds on transit? (David H. Snyder, San Francisco Bicycle Coalition)

The plan made very low assumptions about the number of bicyclists who will attend ballgames.

According to the chart on page IV.101, the plan estimates that zero patrons will arrive by bike for weeknight games. Is this a typographical error? For weekday games, 212 people are expected to come by bike. Weekend games are expected to attract 308 bicyclists, or .8% of total patronage. These numbers are extremely low estimates.

According to a 1996 survey by RIDES for Bay Area Commuters, 2.8% of full-time San Francisco residents ride their bikes to work. The survey is taken in April. The actual rate of bicycling during the baseball season is significantly higher, because the weather is better and daylight longer in the summer.

The San Francisco A La Carte a la Park event, [is] a weekend fundraiser for the San Francisco Shakespeare Festival. Held in Golden Gate Park in August, the festival attracted approximately 250 bicyclists, or 5.5% of 4,500 total participants, arrive by bicycle. No special promotion of bike access was carried out, except to announce that bike parking would be provided. A December 1996 survey of visitors at the DeYoung Museum found that 4.1% of *all* weekend visitors—not just those coming from the City—came by bike. Of visitors

coming from San Francisco, 6.1% came by bike. The DeYoung survey was conducted in December, when bicycling rates are low.

There is no reason to assume that the attendance rate to weekend ballgames in China Basin will be less than one-fifth the attendance at events in Golden Gate Park. (With a concerted effort to promote bikes, and with improvements on the streets leading to the park, the number could actually be higher.)

Although Giants ballgames attract a great deal of out-of-town fans, the ballpark's new location is going to attract more San Francisco fans than the EIR estimates precisely because it is within biking distance. Because both BART and CalTrain are accessible to bicyclists, even out-of-town fans will bike to the stadium, for at least part of their trip. Fans coming from the East Bay will probably find a bayside bike trip from the Embarcadero BART station to the stadium both more convenient and pleasant than the proposed "bus bridge."

Given the pledged support of alternative transportation by the project's sponsors, including the provision of valet bike parking and lockers for roller skates and other accessories, why is the estimate of the rate of bicycling to ballgames—even on the weekends—so much lower than the rate of bike commuting in San Francisco? (David H. Snyder, San Francisco Bicycle Coalition)

Response

Deterrents and Encouragements - It is acknowledged that if proper accommodations for bicycling and bicycle parking are not provided, potential bicyclists will be deterred from biking to the ballpark. Conversely, anything that makes bicycling more convenient or that makes driving less convenient would increase the projected number of fans arriving by bicycle. This includes such indirect actions as higher auto parking fees as well as more direct actions such as providing bike lanes on streets leading to the ballpark, locating the bicycle parking as close to the ballpark entrances as possible, and having the bike parking facilities be secure and free of charge.

As the season progresses, fans arriving by other modes would observe the bike parking facilities and some may decide to bike the next time they come to a game. For this reason, the accommodation of bicycle parking is planned as defined in the improvement measures to be flexible enough to accommodate more bike parking in the future, once actual demand can be assessed. See Response under Bicycle Parking Improvement Measures, below.

Bicycling Distance - One commentor requests that the EIR include the number of potential ballpark patrons who live within half hour bike ride of the ballpark. Given that approximately half of San Francisco is located within a half hour's bike ride of the ballpark, it is estimated that roughly half of the ballpark patrons from San Francisco would live within a half hour's bike ride of the ballpark. (However, this assumption does not take into account that due to the location of the ballpark in a commercial/industrial area, and the distribution of the residential population in San Francisco, that fewer than half the residents live within 30 minutes of the ballpark.) Furthermore, not all San Francisco residents would be going to a ballgame directly from their homes. Tables 3-7, 3-8 and 3-9 in the *Background Transportation Report* present the breakdown of ballpark patrons based on their residence location and whether they are projected to arrive at the ballpark from "home" or "other." ("Other" includes work, errands, personal business, etc.) It is predicted that only 25 percent of San Francisco ballpark patrons would be within a one-half hour bike riding distance from the "Other" locations. The number of ballpark patrons within bike riding distance of the ballpark based on these assumptions is presented in the table below. The exact number would vary depending on the time of day, and ranges from 3,760 to 4,140.

TABLE C&R.1
NUMBER OF BALLPARK PATRONS POTENTIALLY WITHIN BIKE RIDING DISTANCE OF BALLPARK

	Total Number of Patrons Who Reside in San Francisco[1]			Approximate Number of Patrons Within Half Hour Bike Ride Who Reside in San Francisco[2]		
Time of Game	Total	Arrive from Home	Arrive from Other	Total	Arrive from Home	Arrive from Other
Weekday Afternoon Game:	8,848	6,194	2,654	3,761	3,097	664
Weekday Night:	10,547	6,012	4,535	4,140	3,006	1,134
Weekend Day Game:	8,809	7,047	1,762	3,964	3,523	441

Notes:
1. Data from Tables 3-7, 3-8 and 3-9 of the *Background Transportation Report.*
2. Based upon the assumption that half the residential population lives within 30 minutes of the ballpark, which probably overstates the residential market.

Bicycle Forecasts - The peak estimate for bicycling to the ballpark presented in the EIR is predicted to occur for weekend games and was estimated to be 5 percent of the San Francisco residents or 350 ballpark patrons. This is about double the current bicycle commute-to-work rate of San Francisco residents of 2.8 percent. This projection was made before results of the De Young Museum survey were available, and was based on the only existing bicycle modal split information available, which was for work-trips. As discussed previously, the bicycle modal split would vary depending in part on the bicycle facilities provided. If the peak weekend demand could be accommodated, then the demand for weekday evenings, which is expected to be less, could also be accommodated. It is acknowledged that the weekday evening demand estimate present in the EIR, which assumed no bicycle use, was overly conservative, in that it provides a possibly worse traffic scenario with no bike use. Some bicycle use would be expected in the evenings, although much less than on afternoons.

The results of the De Young survey, conducted in December 1996, were that 6.1 percent of San Francisco residents arrived by bicycle. The survey involved a relatively small sample size and may not be statistically significant, as the number of bicyclists responding was small. The survey also revealed that 0.7 percent of other Bay Area residents arrived by bicycle, essentially one of the 136 people who responded to that question. (Not surprisingly, none of the non-Bay Area visitors arrived by bicycle.) The commentor states that 4.3 percent of <u>all</u> Sunday visitors to the De Young arrived by bike and that the EIR assumption of 0.8 percent of all ballpark visitors is only one-fifth the bike-modal split of the Golden Gate Park event. This is not an accurate comparison. First, the sample size for Sunday visitors to the De Young was 94 persons and the four visitors on Sunday who arrived by bike were, in all likelihood, four San Francisco residents. Thus, it should not be assumed that four percent of <u>all</u> ballpark ballpark patrons would arrive by bicycle. The results of the De Young survey validate that the most accurate way to predict the number of ballpark patrons who would bicycle to the ballpark is to base it on the number of San Francisco residents. Using this approach, the EIR bicycle modal split assumption was remarkably consistent with the results of the De Young survey: 5 percent of San Francisco residents versus 6 percent of San Francisco residents, respectively.

It is worth noting that while a commenter notes that the EIR Appendix C states that 1,000 bicycles were attracted to events at Stanford Stadium, the Stanford Stadium seats over 80,000 persons or roughly double the capacity of the ballpark. Much of Palo Alto and the Stanford campus is flat and has a very high level of bicycle use. Consideration of these factors tends to confirm the reasonableness of the forecasts of bicycle use in the EIR.

Since the De Young survey results are now available to help forecast the bicycle mode split, revised projections for the number of ballpark patrons who would bicycle have been prepared and are described below.

Under these new assumptions for weekday evening games, up to 125 ballpark patrons would arrive by bicycle. This is 1.2 percent of San Francisco residents attending a game, and 3.0 percent of the number of San Francisco residents who may live within a half-hour bike ride. For weekday afternoon games, up to 375 ballpark patrons would bike; this is 4.2 percent of San Francisco residents and 10 percent of the number of San Francisco residents who may live within a half-hour bike ride. For weekend day games, up to 475 would bike to the ballpark; this is 5.4 percent of San Francisco residents and 12 percent of the number of San Francisco residents who live within a half-hour bike ride. Since the decision whether to use one's bicycle is highly dependent on whether one expects there to be secure bicycle parking, these figures may not be attained until well after the season starts. But if adequate bicycle parking is made available and this availability is included in all publicity and transportation-related information, then as ballpark patrons see for themselves that secure bike parking is available, a modal shift would occur and more ballpark patrons are expected to bike as the season proceeds. To reflect this new information the following text has been added to p. IV.222 of the EIR, replacing the second and third sentences in the second paragraph:

> **For weekend day games, about 5.4 percent of San Francisco residents who are ballpark patrons attending the game may bike, or up to 475 bicycle riders. About 375 ballpark patrons may bike to weekday afternoon games, or 4.2 percent of the resident market. For evening games, up to 125 ballpark patrons may bike, about 1.2 percent of the residents who would attend the game.**

The following sentence has been added to the end of the same paragraph:

A survey of visitors at the De Young Museum in Golden Gate Park was also used to formulate the demand estimate.[51]

The following has been added as endnote 51 to p. IV.236 of the EIR:

51. DeYoung Museum, "Visitor Survey," December 1966.

All subsequent endnotes have been re-numbered sequentially. In addition, Tables IV.E.6 and IV.E.7, pp. IV.100 and IV.101 have been changed in the Final EIR to reflect the modified bicycle forecasts.

TABLE IV.E.6
BALLPARK PATRON TRAVEL DEMAND BY MODE

	Weekday Afternoon	Weeknight		Weekend
Travel Mode	Post-Game	Pre-Game	Post-Game	Post-Game
MUNI Metro	8.7%	9.8%	3.1%	8.0%
CalTrain	6.5%	1.9%	3.3%	2.5%
BART	5.5%	2.7%	4.7%	1.1%
Bus	9.5%	9.1%	6.9%	7.2%
Charter Bus	1.9%	1.9%	1.9%	2.4%
Walk	***11.8%***	***13.6%***	***2.1%***	***11.6%***
Bicycle	***0.9%***	***0.3%***	***0.3%***	***1.2%***
Taxi	0.9%	1.1%	0.4%	0.8%
Auto	54.3%	59.6%	77.3%	65.2%
Total	100.0%	100.0%	100.0%	100.0%

Source: Wilbur Smith Associates.

TABLE IV.E.7
BALLPARK PATRON TRAVEL DEMAND BY MODE
(PERSON TRIPS)

	Weekday Afternoon	Weeknight		Weekend
Travel Mode	**Post-Game**	**Pre-Game**	**Post-Game**	**Post-Game**
MUNI Metro	3,444	3,876	1,221	3,153
CalTrain	2,576	749	1,314	964
BART	2,146	1,058	1,858	447
Bus[1]	3,745	3,588	2,708	2,842
Charter Bus	761	748	746	958
Walk[2]	***4,658***	***5,359***	***817***	***4,590***
Bicycle	***375***	***125***	***125***	***475***
Taxi	363	459	161	322
Auto Occupants[3]	21,432	23,538	30,550	25,749
Total Persons	39,500	39,500	39,500	39,500

Notes:
1. Primarily MUNI, but also includes AC Transit and Golden Gate Transit.
2. Does not include walk trips from regional and local transit stops or from parking spaces.
3. Includes drivers and all occupants.

Source: Wilbur Smith Associates.

The following change has been made to the first sentence of the first full paragraph on p. I.37 of the EIR to reflect the text added to p. IV.222:

It is estimated that up to 475 persons would bicycle to and from ballgames.

Bicycle parking to accommodate these projections is discussed in the EIR in the section on Bicycle Improvements (p. IV.223). The bicycle parking supply should also consider account demand generated by the ballpark employees.

Bike Lanes and Routes

Comments

Bicycle lanes have not been sufficiently provided for in the area which will lead to traffic/pedestrian/bicycle accidents. (Janet Carpinelli)

More significantly, the Draft EIR fails to analyze the effect of implementation of the city's approved Bicycle Plan. While there are designated "bicycle routes" leading to the ballpark, most of these are currently unimproved. Current estimates for ballpark access by bicycle are based on the street system as it is, without the improvements recommended in the San Francisco Bike Plan. What effect would adding bicycle lanes to Townsend Street and Fifth Street, for example, have on the number of people accessing the ballpark by bicycle?

On page IV.222 the Draft EIR refers to bike lanes on Fifth Street and Second Street ("the two primary bike access route to the ballpark"), the establishment of which would require lane removal or parking removal. Yet, the EIR analyzes parking capacity and intersection level of service for Fifth and Second Streets without bike lanes. This failure to analyze the effects of implementation of a city-approved transportation plan is a serious oversight that impacts the validity of the EIR's traffic analysis.

Specifically, bike lanes could be established on the entire length of Fifth Street in the following manner. Between Market and Harrison Streets, and between Brannan and Townsend, the street could be restriped with three traffic lanes instead of four, providing room for bike lanes. The three lanes could consist of two northbound lanes and one southbound lane, or one lane in each direction plus a middle lane for left turns or which is reversible to accommodate peak direction traffic. Between Harrison and Brannan, where motor vehicle demand for intersection service is high, the bike lanes could be established by the removal of curbside parking. On these two blocks there are no retail establishments who depend upon storefront parking for commercial viability. What would be the effects on level of service and parking capacity if bike lanes are established on Fifth Street, according to the above scenario? Are there variations on the above scheme that might work better?

On Second Street, bike lanes could be provided in a similar manner as on Fifth Street. What would be the effect on level of service on Second Street if bike lanes are provided? (David J. Snyder, San Francisco Bicycle Coalition)

The plan failed to mitigate the negative impact on bicycle safety that the project development will have.

Despite the fact that there is no section on "bicycle mitigation" to accompany the sections on traffic mitigation, transit mitigation, and pedestrian mitigation, there are some good recommendations in the report.

Seventh Street: Currently, Seventh Street has one traffic lane and one parking lane in each direction. Each moving traffic lane is barely sufficiently wide to permit safe sharing of the road. The effect of the plan's recommendation to increase traffic on Seventh Street is effectively mitigated by the proposal to put bike lanes on Seventh Street. Is Seventh Street wide enough to allow for four car lanes and two bike lanes of standard width? If not, is there an acceptable alternative, for example, the creation of a bicycle path alongside the train tracks?

Mission Creek/Berry Street/Townsend Street: Most bicyclists will use the safest of these three streets to travel between Seventh and Third Streets. Currently, cyclists use Townsend, which might be made much less safe if it is re-striped to accommodate more cars but not bike lanes. Berry Street would be the next choice, unless it is redesigned to encourage high speed traffic at the expense of bike safety. The proposed Mission Creek multi-use path is yet another choice in the same corridor. However, Catellus' current proposal for a 40' wide public right-of-way (including creek frontage and landscaping) might not leave a path of sufficient width for the volume of bike and pedestrian traffic that will be expected. What specific safety measures are being proposed so that people may ride a bicycle safely on one or more of these corridors?

Third Street in the immediate vicinity of the ballpark: Currently, bicyclists accessing The Embarcadero from the vicinity of the Lefty O'Doul Bridge can do so relatively safely by using Berry Street. The proposed development would occupy Berry Street, and should therefore propose mitigation to preserve the existing level of bike safety. Possible mitigation measures include bike lanes on Third Street and King Street between Third and The Embarcadero, or, accommodate bikes on the "Port Walk" behind the stadium and link this facility with the bike lanes on The Embarcadero. What measures, specifically, are proposed to replace Berry Street as a safe route for bicyclists between the Lefty O'Doul Bridge and The Embarcadero?

Fifth Street and Second Street: Both of these streets are primary bike access routes to the stadium which should be improved in order to transfer some stadium visitors from cars to bikes. In each case, establishment of bike lanes would require removal of parking or traffic lanes. Specific suggestions are included in section 1, above. (David H. Snyder, San Francisco Bicycle Coalition)

Response

Before and after ballgames the increased traffic and pedestrian activity near the ballpark would make bicycling less safe and more difficult. Although there are few existing bike lanes in the area, ballpark plans would not inhibit the implementation of the recommendations in the San Francisco Bicycle Plan which call for bike lanes on Second Street, Townsend Street, Fifth Street and Sixteenth Street.

mproving bicycle access is a good idea for any recreational or commercial use in the City, s it helps reduce auto traffic somewhat and improves bicycle safety. However, limited icycle parking and on-street routes or lanes are not themselves significant environmental npacts requiring mitigation measures. The following indicates how the bicycle nprovement measures described on pp. IV.223 and IV.224 of the EIR could be nplemented:

eventh Street - The preliminary traffic detour plans described in Chapter V of the EIR call r bike lanes on Seventh Street between Townsend and Sixteenth Streets (see pp. V.33 - .34). Seventh Street at Berry is currently 53 ft. curb-to-curb. This is sufficient width for vo inner travel lanes of 10 ft. two outer travel lanes of 11.5 ft. and two, 5-ft. bike lanes. o on-street parking would be permitted. There is a 14-ft.-wide sidewalk on the west side. On the San Francisco Bike Plan, Seventh Street is shown as being a Class III route.) These ke lanes on Seventh Street have been recommended to improve bike access and safety to e ballpark.

fth Street and Second Street - It is acknowledged that the Level-of-Service (LOS) analysis i the EIR assumed the existing lane configurations for Fifth Street and Second Street and us, did not assume the implementation of bike lanes on these streets. There are several tions for implementing bike lanes, as the commentor describes, and the selected strategies n vary block to block. These options include: removing on-street parking, removing a vel lane and restriping for two northbound and one southbound lane, or two southbound d one northbound lane, or one northbound, one southbound and one center turn lane. The ected options would depend on the traffic and parking needs at each particular intersection proach. The preferred option to implement the bike lanes has not been selected; the pacts of the various options will need to be analyzed as part of the process for bike lane plementation. This process would be part of the implementation of the City's recently pted Bicycle Plan.

Townsend Street - The permanent mitigation measure described on p. V.34 to restripe Townsend Street between Fourth Street and Seventh Street to have four travel lanes is not needed to achieve the improved LOS shown in Table V.B.3, pp. V.35 - V.38. This improvement could be achieved with the temporary traffic improvement measures. However, the implementation of the planned bike lanes on Townsend Street between Third and Eighth Streets would preclude this permanent mitigation measure. The long-term planning for the Townsend Street corridor would consider the trade-offs between the development of a four-lane street versus the inclusion of bike lanes. The text of the EIR on p. V.34 has been modified to add the following sentence at the end of the last bullet item:

> **It should be noted that the restriping of Townsend Street to four lanes would preclude the provision of bicycle lanes on this street as proposed under the San Francisco Bicycle Plan. The long-term planning for the Townsend Street corridor should consider the trade-offs between the development of a four-lane street versus the inclusion of bike lanes.**

King Street - Bike lanes currently exist on the south side of King Street between Third Street and The Embarcadero.

Berry Street - Berry Street between Second and Third Streets is proposed to be eliminated due to the ballpark structure. However, the Port Walk behind the ballpark along China Basin Channel will be available to bicyclists and pedestrians in lieu of Berry Street. This is planned to directly connect with the Promenade on The Embarcadero. However, bicyclists may be required to walk their bikes in this area.

Comment

We ask that the City reject proposed traffic mitigation measures that would worsen conditions for cyclists on streets that are part of the City's bike-route network. Restriping Townsend and Seventh Streets to add traffic lanes would narrow the outside lane cyclists are expected to share with motorists. Illinois Street should not be restriped either because it will likely replace Third Street as the designated bike route along that corridor. These measures would permanently degrade cycling conditions in order to facilitate traffic flows for a few hours every year. (Also, it should be noted that the traffic analysis is quite conservative, so impacts will likely be much less severe than predicted.) (Ellen Garvey, Air Pollution Control Officer, Bay Area Air Quality Management District)

Response

According to the San Francisco Bicycle Plan, Indiana Street, not Illinois Street, is the designated alternative to Third Street for bicycle use. Bicyclists should be encouraged to ride on Indiana Street, although they are free to use whatever street they wish. Therefore, under the preliminary traffic routing plan described in Chapter V of the EIR there would be relatively little conflict between ballpark traffic and bicyclists approaching from the south or southwest.

CalTrain

Comment

Bicycle Impacts (p. IV.222): Each train can hold a maximum of 24 bikes. Bike use is a significant and growing market for CalTrain. Wheelchair users can board CalTrain. Each train can accommodate two wheelchairs. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

The following text has been inserted after the first paragraph on p. IV.223 of the EIR.

CalTrain also has the ability to accommodate bicyclists. Each train can hold a maximum of 24 bikes in special racks designed for this purpose. Each train can also accommodate two wheelchairs.

Bicycle Parking Improvement Measures

Comments

Page I.37 second paragraph: It is estimated that about 200 to 350 persons would bicycle to and from ballgames . . parking demand would be about 150-250 bike spaces; the project sponsor proposes to provide up to 250 secure spaces.

Page III.107 last objective: As part of the proposed project, the Giants have committed to provide a designated fenced bicycle parking area for about 250 bicycles in the proposed parking lot immediately south of China Basin Channel.

Why is bicycle parking demand less than the estimated bicycle traffic? With the excessive pedestrian load predicted on sidewalks in the area of the ballpark, surely bicycle parking on area sidewalks will be prohibited. Thus, bicycle racks on sidewalks is not feasible. Also, the 15-20 minute walking radius for automobile parking is probably not realistic for cyclists, who are accustomed to parking on the sidewalk directly in front of their destination. Table X.C.14, in Appendix C., Page A.135, shows that Stanford Stadium attracts over 1,000 cyclists per game by offering guarded bike racks. Finally, the Giants have stated that they want to encourage all forms of non-auto traffic. Therefore, shouldn't the number of secure bicycle spaces provided be the maximum estimated to be necessary, at least 350 spaces, from the very beginning of the operation, with provision for additional overflow parking as soon as it's shown to be needed? Also, it should be specified that the bicycle parking lot, if it is located south of the Channel, will be at the northernmost point of any South of Channel lot, and that it should be free of charge, if at all possible? (San Francisco Tomorrow Waterfront Committee)

What bicycle parking facilities will be provided in this parking garage [on the ballpark site]? (San Francisco Tomorrow Waterfront Committee)

Page III.107, Bicycle parking: Policy 28.1 of the Transportation Element calls for providing bicycle parking in new developments. Locating bicycle parking south of China Basin channel, rather than on-site, would not conform with this policy. (Steven L. Vettel, Residential Properties Group)

Bicycle parking: There is insufficient bicycle parking. If adequate bicycle parking is not provided, bicyclists will park on the sidewalk which will affect the flow of pedestrian traffic. The EIR calls for 250 parking spots for bicycles. We propose that there should be 500 permanent spaces with 500 additional spaces for bikes available for weekend day games. (Andy Katz, San Francisco Tomorrow Waterfront Committee)

Page II.19: Describe the location and amount of bicycle parking. (Steven L. Vettel, Residential Properties Group)

The proposed bike parking lot across Mission Creek Channel is poorly situated.

Just as car parking will be scattered all around the stadium, and four pedestrian entrances permit access from every corner of the building, the bike parking areas should be scattered around the perimeter. There should be significant bike parking on the east side of the building (since many cyclists will be arriving from the Embarcadero) and at the northwest corner of the building, as well. Signs at each location should inform cyclists of additional parking in the lot across the channel. How much bike parking could be established around the perimeter of the stadium, in place of parking across the channel? Why did the EIR not mention the 2,500 bike and skate lockers that the project sponsors intended to install, according to an early news article?

utting the primary lot across the bridge from the stadium would provide effective parking nly under the following circumstances: 1) it was *in addition* to perimeter parking; 2) the lot *immediately* across the bridge, therefore not requiring bicyclists to ride much further than ecessary; 3) dedicated lanes or routes to the lot are set up so that cyclists don't have to avigate through dense crowds of pedestrians; 4) the lot is aesthetically attractive; and 5) it is uly secure, which would probably require a human attendant, since the lot would be so far way from regular activity and especially vulnerable to theft. (David H. Snyder, San rancisco Bicycle Coalition)

'e recommend that the 250 proposed bike-parking spaces be increased to at least 400 to :commodate the number of bicyclists expected to weekend games. (The DEIR predicts 350 'clists from San Francisco alone.) Also, we think it is important that the parking be rovided at the ballpark itself. Locating it across the Channel, as proposed, will discourage 'cling to the site because one of the advantages of cycling is the ability to park next to ne's destination. Furthermore, the parking should be designated by bicycle-parking onsultants to avoid inadequate designs, which can sometimes be unusable. Finally, we ıcommend that the proposed Ballpark Transportation Coordinating Committee include a lcycle representative, perhaps from the City's Bicycle Advisory Committee. (Ellen Garvey, ir Pollution Control Officer, Bay Area Air Quality Management District)

[.]s promised, the Giants should provide secure free storage for roller skates and skate oards as well as the bicycles as noted in the DEIR. (Howard Strassner, Chair SF Group, ierra Club)

esponse

I is acknowledged that if insufficient bike parking is provided, there would be two dtrimental side effects: 1) ballpark patrons who arrive by bike would be forced to attach t:ir bikes to anything they can find (parking meters, trees, fences) which may impact pdestrian flow; 2) the ballpark patrons' mode choice may change, as the next time ballpark ptrons may choose to drive rather than leave their bike in an unsafe and/or inappropriate pice. The forecasting of bicycle demand is speculative however, as little information is aıilable relative to bicycle use to downtown ballparks. As a result initially the amount of p'king provided for bicycles could be less than the demand, provided the ability exists to ir rease the supply as needed.

E:n less information is available for special travel modes such as use of roller blades and sl teboards. Until the ballpark is in operation and ballpark patrons who have an interest in using

one of these modes to reach the ballpark decide to try it out, it will not be clear what the true demand is. As a result it is important to provide facilities for these modes when the ballpark opens, and retain flexibility to expand the supply so that the facilities can be expanded in the future if demand warrants. This must occur quickly to avoid discouraging bicycle use.

The most convenient location for the provision of secure bicycle parking would be on the ballpark site itself. However, as has been noted in the pedestrian analysis (p. IV.220), the available sidewalk space along the King Street and Third Street frontages of the ballpark would be constrained. There would be a parking and loading area inside the ballpark structure. However, at this time it appears that the parking area would have to be devoted to parking for the disabled in order to satisfy the requirements of the Americans with Disabilities Act (ADA).

The alternative to an on-site bicycle parking area would be to provide a secure parking area in the designated ballpark parking lots located south of the Channel. As the Third Street Bridge will be closed to auto traffic and restricted to pedestrians, bicyclists, and transit vehicles before and after games, access to this area would be relatively convenient for bicyclists. According to the Giants the parking lot would be well lighted and guarded by security personnel during games.

The following text has been added to p. IV.223 of the EIR, replacing the third bullet item in the improvement list:

- **To accommodate the bicycle parking demand, to further increase the bicycle mode share, and to conform with the Bicycle Parking Policy 28.1 of the Transportation Element to provide bike parking in new developments, the following improvements should be considered:**

  1. **Provide a minimum of 150 secure bike parking spaces with the flexibility to accommodate up to 250. This could be a fenced area watched by an attendant or security guard in the parking lot immediately south of China Basin Channel as close to the Lefty O'Doul (Third Street) Bridge as possible.**

2. **Provide overflow bike parking for 200 to 300 bikes, with the flexibility to expand this as needed.**

3. **Provide a secured storage area for roller blades and skateboards, possibly by either a valet-style check-in system or individual lockers.**

4. **The availability of bicycle parking and the parking for roller blades and skateboards should be included in all transportation-related information and brochures.**

The third sentence of the first full paragraph on p. I.37 of the EIR has been changed as follows to reflect the text added to p. IV.223:

The project sponsor would consider providing 250 secure spaces with overflow parking for 200 to 300 more bicycles as needed.

Transportation Mitigation

Transportation Mitigation, General

Comments

A plan must be included that protects residents and small businesses from the impact of traffic intrusion and ensures adequate parking, service and loading spaces will be available to small businesses and residents of the area. These neighborhood quality of life standards are mandated by Prop M, priority policies. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

The EIR states that 27-38 intersections in this part of the city will drop to levels of service rated E and F. These are below city standards and represent huge areas of gridlock in Soma, Potrero Hill, South Beach, and the Financial District. I cannot even imagine the chaos that will reverberate through the city. Not only is mass transportation not included in the Giants project but the mitigation efforts mentioned are by the EIR's own submission an insignificant solution to the problem created. Mass transportation incentives tied to ticket prices and the Giants financial support to increase current services are necessary to solve this problem. (Nancy Anding)

The EIR also says that the mitigation measures that they discussed they acknowledge are insignificant. So even the mitigation measures they put together, they conclude are not going [to] work that well. (Nancy Anding)

I think the neighborhood and the Giants have something in common. We both need the traffic and the other problems to be solved for it to be a successful neighborhood, and for the Giants to have a successful stadium. (Bill Wigert)

The EIR is a worst-case scenario study. In this draft, as has been said before, there are no surprises. We know that there will be traffic. But by preparing a comprehensive traffic management plan, like other cities who have been built downtown facilities, this can be mitigated. San Francisco is no different than any other city in dealing with matters like this, with an ability to respond in a positive manner.

It is important to remember that this facility will also be served by many forms of mass transit. Caltrain, ferry, light rail, which, together with a comprehensive traffic plan, can lessen the impact of traffic. (Chris Kelton)

All discussion centers on the ability to bring people to and from the new ballpark. What efforts have been made to protect existing residents and businesses from the major inconveniences of the event day traffic which will render them prisoner to the excesses 81 days per year? (Michael Karasik, Bayside Village Associates)

am concerned, as are many in the Potrero Hill neighborhood about the traffic problems that ill be generated by this proposal. I believe that the mitigations that you have already heard re necessary and must be included in the final approvals for this project. I understand that is going to move forward and that with any foresight the public transit opportunities that re there will be taken full advantage of. (Jim Firth)

ransportation is by far the most critical concern both to the community and the Giants, and ur survey of 600 people confirmed that wholeheartedly. An effective transportation anagement plan, as we said, is essential for the ballpark to succeed and for the affected... djacent neighborhoods to maintain the quality of life standards, particularly with spect to parking and access.

he EIR, as presented, is technically exhaustive, and I would say quite proficiently done. ut as we have indicated, we believe it is quite one sided and leads to most unsatisfactory nclusions with respect to traffic and transportation. While the analysis is most detailed, e conclusions are most uncertain stemming principally from the fact there is neither mmitment or closure on transportation mitigation measures....According to the EIR, cision-makers will have all the information on mitigation costs at the time the project is viewed and approved. This certainly is not the case now. There is still a month or two, ut you all need to make sure that the kinds of things that we and others ask for are made ailable.

nfortunately, the unqualified analysis, which I referred to, permeates the EIR. It is full of ulds, shoulds, coulds, mights and other assumptions. Spend enough money and almost any pact can be reduced. However, there are a few wills.

onsequently, the EIR is incapable of drawing any meaningful conclusions regarding vironmental impacts, particularly with respect to the most significant issue of nsportation, at this point in time. (Jim Haas, Rincon Point South Beach Citizens Advisory ommittee)

he DEIR states that in developing transportation mitigation measures for the ballpark, the nsportation and traffic/parking plans be developed for similar facilities in San Jose and nver were used as models (page V.3). However, the DEIR does not carry this comment its next logical step, which is to recommend that a formal Transportation Management an be developed as a function of the EIR process and that this plan become the andbook" for an integrated transportation mitigation program which should be developed, plemented, and managed.

e accomplishment of a detailed Transportation Management Plan for the Giants Ballpark is y important and should be considered an essential element of the mitigation planning ort. (Douglas G. Wright)

Various members of the Potrero Hill community will be providing testimony at today's meeting identifying areas of neglect and omission in this draft EIR as it affects our community. Most seriously how we will be affected by the created pedestrian and automobile traffic and the omission of any mitigation measures for such. (Richard C. Millet)

Unfortunately, the narrowly focused "angle" which the authors of this document then took was to analyze the ways in which the Giants could, in fact, deliver their patrons to the ballpark, given those circumstances.

The Market Street "bus bridge," the closure of the 3rd Street bridge before and after ballgames, and other such measures designed to deliver patrons to the ballpark, are all described as "part of the project." By contrast, not a single mitigation measure designed to protect neighborhood merchants and residents is described as "part of the project." Instead the adoption of any such mitigating measures is left to a to-be-formed "Ballpark Transportation Coordinating Committee" to be made up of the Giants and six or seven City agencies. The problems with this approach are obvious to even the casual observer. (Rick Mariano)

Transportation is by far the most critical concern for both the community and the Giants. Over 600 respondents to our CAC's survey, which reached over 4,000 people, convincingly confirmed this. Traffic congestion ranked first over all other issues with a 30% urgency factor over the second most important issue, noise, which was followed by safety concerns...Unfortunately the DEIR, while a technically exhaustive document, leads to most unsatisfactory conclusions with respect to traffic and transportation. While the analysis is most detailed, the conclusions are most uncertain, stemming principally from the fact that there is neither commitment nor closure on transportation mitigation measures. (James Haas)

An effective *Transportation Management Plan* and Program is essential for the ballpark to succeed and for affected adjacent neighborhoods to maintain acceptable quality of life standards, particularly with respect to access and parking. (James Haas)

When will a *Transportation Management Plan*, based on a realistic assessment of available resources, be available? This information, along with a *Transportation Management Plan*, should be part of the DEIR and supporting background documents. We feel the DEIR is incomplete and inadequate without these documents. (James Haas)

While a *Transportation Management Plan* has not been produced, we would like to offer that it be based on the following Planning Principles: First and foremost, area residents, merchants and neighborhood groups must be formally included with city officials and the Giants in the formulation and ongoing operation of the *Transportation Management Plan*. This must be defined as a mitigation measure for this project. Transit First - including dedicated lanes, signal pre-emption, economic incentives, and preferential passenger boarding for transit users. Incentives for transit and high occupancy vehicles such as ferries, charter buses, vanpools, car pools and taxis, including dedicated lanes, reduced parking rates and

referential parking for high occupancy vehicles. Gracious accommodations for pedestrians, yclists and other non drivers...Incentive program for MUNI / Public Transit use, including iscounted passes, free MUNI boarding for "Bus Bridge" or post event boarding, tc...Encourage downtown fans to leave cars in existing lots and have them walk or use IUNI or other private shuttle services. Support MUNI service expansions such as the Third treet streetcar service and the E/F line connection with MMX service. Insure that there is dequate rolling stock to support anticipated service demand. Provide an "Emergency / raffic / Transit Command Center" within the ballpark to manage and control the effective nction of all transportation modes. (James Haas)

ecognizing the vital importance of effective transportation, it is imperative that we all work gether to insure implementation of a *Transportation Management Plan* based on the city's Transit First" policy.

is also recognized that addressing transportation requirements is a dynamic process that ed be responsive to many important variables. Consequently plans must be geared to ecific events; specific times of day, day of week and expected attendance. Implementation plans requires flexibility and the cooperation of many city departments. It is our view that eparation and ongoing update of an effective *Transportation Management Plan* will be most fective with active and direct participation by affected neighbors and businesses. onsequently, we urge that the DEIR include as mandatory, a mitigation measure that quires the preparation of a *Transportation Management Plan*, its annual update, and formal d direct participation by neighborhood resident and merchant representatives. The mmitment to keep current and implement the *Transportation Management Plan* runs for the e of the ballpark. Without this type of commitment, this DEIR should be considered an adequate document. (James Haas)

mong the issues that should be addressed in the mitigation monitoring program are the llowing:

- The development of a comprehensive Transportation Plan to include all means of access to the ballpark and the neighborhood: automobile, public transit, pedestrian and waterways with related parking, delivery and docking facilities. These are largely out of the control of the ballpark or any private entity and can only be developed by the City...

- The Transportation Plan should include, among other concerns, the following:
  - Developing a "Transit First" program with incentives for promoting transit over automobile travel.
  - Directing automobile traffic to available parking.
  - Further consideration of the number of day games and the starting times of all games.
  - Establishing and promoting quality pedestrian routes.

These issues have all been handled well elsewhere, and we commend the Denver example to the City...We also believe the above actions will result in a fair and workable integration of this park and the City it serves. (James Ream, Co-Chair, Ron Blatman, Co-Chair, SPUR Ballpark Task Force; James Chappell, President, SPUR)

What is needed is a management plan, a management plan that can be developed over the next couple of years after the certification of the EIR, a management plan for transportation, and for neighborhood impacts, including both those on housing and on the marina. We believe this management plan needs to be developed with public input, and that the city operating departments must be a part of that in both the planning and the funding of this management. And I hope that the commission will ask the Mayor to so direct those operating departments to participate in the process. (Jim Chappell, President of SPUR)

I would like to stress that the Planning Commission have the draft environmental impact report, make a commitment between the agencies and the residents to make sure that a comprehensive traffic management plan is implemented, and that all the parties are committed to making sure that our of life does not deteriorate. (Barbara Inaba)

...the Transportation Management Plan which, according to the authors of the Draft EIR, will be the product of the Giants and the various City agencies' deliberations, is scheduled to be adopted after the EIR is certified, and after the granting of construction permits for the ballpark. This must not be done without the adoption of specific neighborhood traffic mitigations, or at the minimum, the establishment of a set of neighborhood-serving parking and traffic standards being analyzed and agreed to as "part of the project." (Rick Mariano)

There is not identified Traffic Management Plan ("TMP") to evaluate. The onus should be on the Giants to develop a workable TMP. (Michael Karasik, Bayside Village Associates)

V.43, Transit Incentives: This is a critical mitigation and needs further expansion. What have other cities done and what have been the results? What impact can this really be expected to have on mode split and how will this change over time? (Diane Nygaard)

And we need a transportation management plan with the following principles: Residents, merchants, and neighborhood groups must be formally included in development of the plan. Must be transit first. Incentives for transit and high occupancy vehicles must be built in. Accommodations for pedestrians, cyclists and other non-drivers. And we need to avoid channel crossings to the greatest extent possible. Incentive programs for Muni and public transit need to be built in. Satellite Muni boarding and ballgame express buses need to be developed. We need to encourage downtown fans to leave their cars in their garages and existing parking lots. We need to support Muni service expansions such as the Third Street street car line and the so-called E or F line, MMX, and that the adequate rolling stock for those be obtained. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Any regional transit coordination planned? [Are there] incentives for high occupancy vehicles, vans, carpools, etc? (Michael Karasik, Bayside Village Associates)

We need to provide an emergency traffic and emergency traffic and transit command center for the ballpark and the surrounding area...(Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

The ability to mitigate the transportation impacts of the ballpark project is heavily related to the successful implementation of two of the EIR mitigation measures:

1. The development of a detailed and comprehensive Transportation Management Plan (TMP) as outlined on pages V-3 and V-4 of the EIR and defined in more detail in the *Transportation Background Report* on pages 5-3 and 5-4. The transportation mitigation section of the EIR (V.B) provides an outline of the elements of this plan, but the Giants must work with the existing transit agencies, and others to develop a plan that addresses the detailed requirements of each mitigation or improvement measure. The TMP should be designed to protect residences and businesses from the impact of traffic intrusion, parking intrusion, pedestrian flows, and conflicts with service and loading requirements.

2. The formation of a Ballpark Transportation Coordinating Committee (BTCC) to oversee the implementation of the TMP as outlined on page V.4 of the EIR. This committee would have the responsibility of addressing the transportation needs of the ballpark and the surrounding areas and neighborhoods in response to the actual application of the TMP to each ballpark event at the ballpark.

A number of comments suggested that the BTCC include members representing the neighborhoods. There were also a number of suggested additional mitigation and improvements to be added to the TMP. These are addressed below in this response.

A Transit Incentive Program is one of the mitigation measures that would have to be fully developed in the TMP. Incentives such as fare discounts, promotions to increase transit use, and dissemination of transit information will need to be part of this program as outlined on page V.43 of the EIR. Other transportation improvements such as the pedestrian and bicycle improvements outlined on page IV.223 of the EIR would be addressed by the TMP.

An example of how the TMP and the BTCC would work relates to the many concerns expressed by Potrero Hill and other neighborhood residents about traffic and parking impacts in their neighborhoods. The transportation mitigation section of the EIR provides a preliminary traffic routing plan and other mitigation measures designed to minimize neighborhood intrusion and impacts. Until the actual implementation of these measures for a ballgame, it will not be clear as to their overall effectiveness. The analysis of impacts of the preliminary traffic routing plan and related measures provides the best assessment possible of the effectiveness of measures to reduce impacts of the routing plan. However, the plan would need some flexibility to adjust to actual conditions once the ballpark was in use. The role of the BTCC would be to monitor the effectiveness of the TMP. Concerns about the effectiveness of the plan could be expressed to the BTCC, and they would then develop and implement changes to the TMP to address the problem.

The term "part of the project" when used in reference to a mitigation measure means that the measure is planned as an element of the project by the project sponsors and that the mitigation measure will be implemented if the project is approved and completed. This does not mean that the mitigation focused strictly on addressing the needs of the project. While the underlying purpose of many of the mitigation measures and improvements would be to deliver fans to and from the ballpark in a convenient manner, the measures were also designed to minimize and control the impacts on the surrounding areas and neighborhoods. This was, for example, a key objective of the traffic routing plan and the transit mitigation plan. The reduction of impacts benefits both the project and the study area neighborhoods.

The EIR cannot make mitigation measures mandatory as requested by one commentor. Most mitigation measures identified in the EIR are described as "should" or "could" be implemented because specific measures have not yet been agreed to and formally adopted and cannot be prior to certification of the EIR by the City and the project sponsors. As part of any action on the project, decision-makers will consider the feasibility of each measure and require that it be included or reject it as infeasible. It is premature to describe either the project or the mitigation measures in terms of "will", as it has not yet been finally approved.

The following text has been added to the EIR on p. V.3 after the last paragraph to clarify the role of the TMP:

> **The Giants and the City would be responsible for the development of a similar plan, the Transportation Management Plan (TMP). The TMP should be based upon accepted planning practices and principles with emphasis on incentives for transit, pedestrian, and bicycle modes and disincentives for auto modes. In particular it should encourage downtown employees and visitors to walk, bike, or ride transit to the ballpark, and to leave their cars at home or in existing lots away from the ballpark.**

Both the E/F Muni lines connection and the Third Street Light Rail would enhance transit access to the ballpark and so should be considered as potential opportunities in the Transportation Management Plan. Similarly, dedicated lanes, signal pre-emption, and economic incentives to use transit should be part of the plan. It is not clear what is meant by "preferential passenger boarding for transit users." However, special passenger loading provisions for the MMX light rail and the Bus Bridge are part of the features included in the transportation mitigation section V.B of the EIR. See the following response for more detail on MMX passenger loading.

The Ballpark Transportation Coordinating Committee would have the responsibility for regional transit coordination, as representatives of the regional transit operators would be members of this group.

As the average auto occupancy of vehicles bringing fans to the ballpark would be 2.7 - 2.9 persons per vehicle, almost all these vehicles would qualify as carpools. Special incentives for carpools in this case would not be practical or beneficial. The Travel Demand Management program that the Giants should implement (p. V.44), would include consideration of carpool and vanpool incentives for employees and concessionaires as well as a number of other trip reduction measures.

An example of one issue the BTCC would address relates to a suggestion made by several commentors regarding the need to provide a traffic control or command center. There would be a need for the BTCC to work out a plan for coordinating the efforts of the Giants transportation staff, crowd control personnel and parking lot attendants, with the efforts of the PCOs. In addition communications with the transit operators, bridge tenders, police, fire/emergency services, and others would be needed. The issues of how this coordination would occur may be more important than where it occurs, but a space at the ballpark or elsewhere could be reserved for this purpose. San Jose has a traffic control center in the City Streets and Parking Department for monitoring Arena events.

Comment

[I]t is extremely thorough in illuminating the impact of the automobile. Not just as a result of this project, but also of the development of Mission Bay both north of the channel and the UC project and the terminal separat[or] area. The one thing that all these developments have in common is that they are already or soon will be under the aegis of the Redevelopment Agency. Therefore, it is the responsibility of the Redevelopment Agency to mitigate the extreme impacts outlined in this report by removing automobiles from the area. It is essential to the future economic health of these projects and to the viability of the neighborhood that this be done. As a required mitigation, it is the responsibility of the Redevelopment Agency to develop and implement a transportation plan for the entire South of Market area, not just the survey area. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Response

The commentor suggests that as mitigation of cumulative impacts around the ballpark in the sector of the City between the proposed Transbay Redevelopment Area and the proposed

Mission Bay North Redevelopment Area, the SFRA should "remove automobiles from the rea" and formulate and implement an areawide transportation plan. Until the Transbay and Mission Bay areas become Redevelopment Projects, the SFRA would not have any jrisdiction in these areas and would not be able to implement any mitigating measures or trategies. The SFRA would become involved in the mitigation of significant adverse ransportation effects to the extent that traffic is generated or otherwise attributable from the roposed Transbay and Mission Bay North Redevelopment Project Areas, and the possible lission Bay South redevelopment survey area, at such points in time as these areas become edevelopment Projects. Accordingly, as part of the redevelopment plan adoption process, ie SFRA and the Planning Department would direct the preparation of EIRs that analyze the ansportation impacts of a particular proposed Redevelopment Project, and which will be rculated for public review and comment. Transportation effects of each proposed project ould be evaluated in combination with other major development projects in the City; owever, the adoption of a policy to remove, or otherwise restrict automobiles from the area id formulation of a South of Market area transportation plan are major policy decisions for ie City and are not decisions that can be made by the SFRA. Even if all the potential idevelopment project plans are adopted, the SFRA would not have jurisdiction over the ntire South of Market area. Formulation of an areawide transportation plan would involve ot only the Planning Department and the SFRA, but also the Mayor's Office, Department of lrking and Transportation, the Municipal Railway, Department of Public Works, the Port id other City department and agencies.

Comment

We believe that the cumulative traffic impacts of the Ballpark Mission Bay, UCSF, and Terminal Separator developments require far wider attention than the proposed Ballpark Transportation Coordinating Committee. The Redevelopment Agency, as the agency that will be responsible for virtually all development South of Market, must also be the lead agency in developing and funding solutions for the problems created by this development. This Committee as it is proposed is inadequate to the problem; it lacks neighborhood representation, adequate funding, and a mandate to attack the problem on an areawide basis. Therefore, as required mitigation, Redevelopment should be required to develop, fund, and maintain a Transportation Management Plan for the entire South of Market area. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Response

As discussed in Response to Comment JnC.2, the SFRA would not have any jurisdiction in the Transbay and Mission Bay areas unless, and until such time as, these areas become Redevelopment Projects. Then, the SFRA would become involved in the mitigation of significant adverse transportation effects to the extent that traffic is generated or otherwise attributed to the Redevelopment Project Areas. Notwithstanding, development and implementation of an areawide transportation plan would involve many City departments and agencies. The adoption of such transportation plan would be a decision for the City and not the SFRA.

The Transportation Management Plan for the ballpark would be refined by the Transportation Coordinating Committee. It would address both traffic generated by ballpark events and traffic in the area that is not generated by the ballpark. The Transportation Coordinating Committee would adjust the Transportation Management Plan over time as necessary, based on experience.

Game Times

Comments

[T]he DEIR recommends a limit of 13 weekday games per year to mitigate traffic impacts. However, this requires at least 40 night games per year, which will greatly exacerbate noise, light, security, and pedestrian noise impacts in the neighborhood because of the late hour that games will extend to and following which fans will be leaving the ballpark. Had neighborhood impacts been analyzed, along with traffic impacts, the DEIR may well have recommended that weekday games be *maximized*, not minimized. (Steven L. Vettel, Gladstone & Vettel)

[B]ecause CEQA narrowly defines what environmental impacts are, in this case the neighborhood impacts are limited to traffic and noise, the mitigation program is similarly skewed to mitigate those issues. In this case, there is a lot of transportation mitigation suggested, but there is no one analysis of how that might negatively impact other things.

A good example of that is that the EIR suggests that weekday games be limited to 13 a year so that you can mitigate the traffic impacts of the day games and impact the p.m. peak period. The problem with that is that that shoves all the games into the evenings. There are

bout 40 evening games proposed, 40 or 50 a year, which is really going to more heavily npact the neighborhood on issues like lights, like noise, like traffic noise, like people aving at 11:00 o'clock at night and going through the neighborhood.

y the EIR focusing just on traffic and mitigating traffic, it ignores these other issues, so it roposes a mitigation measure that maybe improves traffic but exacerbates all the negative npacts on the neighborhood. (Steve Vettel, Bay Side Village Associates)

Page V.44: As noted above, there should be an incentive for weekday games, not a limit. Early or late start times (11:30 a.m. to 12:00 noon and 3:30 to 4:00 p.m.) should also be considered. All weekday games should start early enough or late enough to avoid the P.M. peak period. (Steven L. Vettel, Residential Properties Group)

Add earlier afternoon weekday games as a project mitigation: A project mitigation that would eliminate many of the impacts on transit operators would be to set the game starting times earlier for weekday afternoon games. These games appear to create the most troublesome conflict because a concentrated number of departing ballpark patrons would be entering the BART station during the peak commuter period when station use is at its highest. Earlier games would provide better assurance that BART and other transit providers have ample capacity to serve the ballpark patron travel needs. This should be added as a project mitigation. (Karita Zimmerman, Manager, Environmental Compliance, BART)

p IV.177, Transit Capacity - As noted, game ending time on weekdays is an extremely critical factor dramatically affecting our ability to provide vehicles for stadium service. As game ending times encroach onto the shoulders and into the peak rush hour, Muni may not have the necessary vehicles to serve the ballpark post-game. We had requested and the Giants had agreed to noon game start times on weekdays. League rules appear to permit noon start times, and we still ask the Giants to honor their earlier commitments. Also, adding large amounts of additional traffic into the heavy post-work commute is simply not a good idea. (Peter Straus, Manager of Service Planning, Muni)

Page V.2: The DEIR suggests limiting weekday games to 13 per year to mitigate impacts on the P.M. peak traffic period. However, this strategy requires a very high number (40+) of night games, which have far greater non-traffic impacts on the surrounding neighborhood in terms of pedestrian and traffic noise late at night, security issues, light and glare impacts, and late night event noise impacts. The approach instead should be to encourage weekday games (because they have fewer neighborhood impacts), but schedule them to avoid traffic conflicts with the P.M. peak period. We suggest a 12:00 noon or 3:30-4:00 p.m. start time, so that traffic after games occurs either before or after the P.M. peak period (see page V.44 for a similar suggestion). MUNI has stated that it cannot provide vehicles dedicated to exiting ballpark fans if games start later than 12:00 noon (See 2/27/96 memo from Philip H. Adams to Rudy Nothenberg, Appendix I-12). The EIR needs to identify any major league or players union constraints on game start times. (Steven L. Vettel, Residential Properties Group)

[W]e would like the EIR to look at an increasing the number of day games, as opposed to limiting the number of days games and perhaps moving those day games to a 12:00 clock start or 3:45 start so you avoid the p.m. peak. (Steve Vettel, Bay Side Village Associates)

In addition, we have some specific mitigation for this project. We suggest adjusting the game time schedules. For instance, the evening game, the day before get-away day could start at 3:30 or 4:00. That would allow you to start the day game the following day earlier, say, between 11:00 and 12:00 o'clock. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

We need to do such things as look upon daytime games starting at noon...(Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

V.44, Game Times: One of the best, and lowest cost mitigations is to change both weekday afternoon and evening start times to 3:30 p.m. (Diane Nygaard)

Move weekday day games to either 11:00 a.m. or 4:00 p.m. to begin and end counter to the rush hour as it exists now. (Michael Karasik, Bayside Village Associates)

Give serious consideration to starting midweek games at **noon**, so that fans leaving at the end of a game miss, and do not contribute to the evening commuter travel peak. (James Haas)

Response

The EIR did not recommend a limit of 13 weekday games. The San Francisco Giants provided the information about the approximate number of games for each of the three time periods. Increasing the number of weekday afternoon games in order to reduce noise, light, and security-related effects in the evening would require the acceptance of an increase in the frequency of the transportation impacts which would be associated with a weekday afternoon game. These impacts would be substantial compared with the transportation effects of a weekday night game and would affect more people. Ballgame noise, light and security issues have not been shown to have a significant environmental impact, although they may be annoying to some local residents.

League rules, team travel schedules and other factors somewhat limit the Giants ability to change the start time of games (see p. IV.77). The Giants have indicated that start times of 12:35 and 3:30 p.m. on weekday afternoons may be feasible, but not for all afternoon

;ames. If scheduling and business considerations permit, the project sponsor could consider cheduling some night games at 3:30 p.m.

n addition to ballgames, the project sponsor has provided clarification that there could be ther types of events, including up to five maximum capacity events (up to 50,000 people), p to 20 open-air events including 15,000 to 42,000 people, and 30 to 40 music events in a emporary enclosed amphitheater including 5,000 to 15,000 people. Additional small open-ir events could also be held (see response in Project Description, Type and Number of vents).

allpark Transportation Coordinating Committee

omments

age V.5: There must be neighborhood representation on the Transportation Coordination ommittee, both to provide information on neighborhood access, parking and other needs d to offer solutions to transportation impacts from a neighborhood perspective. (Steven L. ettel, Residential Properties Group)

ART looks forward to participating in a Ballpark Transportation Coordinating Committee n an on-going basis. We are committed to working with the project sponsor and the San rancisco Municipal Railway to make travel to and from the potential new Giants Ballpark as nvenient as possible. (Karita Zimmerman, Manager, Environmental Compliance, BART)

he DEIR suggests that Ballpark Transportation Coordinating Committee be established to fine, implement, and monitor a transportation mitigation program (Page V.4). The DEIR ggests that, similar to a committee currently employed at 3Com Park, this Committee uld include appropriate City of San Francisco Department heads who would be in sitions of authority with regard to the mitigation program.

his is a good suggestion, the formation of this Committee should be made a certainty, and it uld be created as soon as possible. Residents, property owners, and commercial erators in the South Beach neighborhood should be well represented on this Committee. ouglas G. Wright)

ch a [Transportation Management] Plan would be the operating manual for use by the rementioned Coordinating Committee. The Committee should have the ability over time, experience with the Ballpark's operation is realized and/or changes occur in the rrounding neighborhoods, to modify the Plan accordingly. (Douglas G. Wright)

Transportation: Part of the Proposed Transportation Mitigation Measure is the formation of the Ballpark Transportation Coordinating Committee. (DEIR AT V.4). In its present conception, it will contain only representatives of City, County and State government. To make this Proposed Mitigation Measure effective, CBL Office Buildings should have a representation on this committee. (David P. Cincotta, representing China Basin Landing, Ltd.)

Include Neighborhoods in Coordinating Committee: The Ballpark Transportation Coordinating Committee described on page V.4 (Mitigation) does not, but must include representatives of residents and businesses in the affected areas. Mission Creek must be included on that committee. (Philip DeAndrade, Mission Creek Harbor Association)

Unfortunately, the angle that the authors of the draft EIR took about that [the tremendous traffic backups] was to spend lots and lots and lots of time explaining how the Giants could get their people to their seats and back out of the ballpark...and defined each of those measures that would help the Giants do that as part of the project. They define not a single neighborhood protective, quality of life protective measure as part of the project that would protect this neighborhood, not one.

That, again, I think, falls back to how they define the project in the first place. There are ways to take care of this stuff. We have seen it work in Denver, but it has got to be worked out, and it can't just be said that it is not much to consider.

The transportation management plan that is recommended to be set up is recommended to be set up and established by about six city agencies and the project sponsor, that being the Giants. To me, that is really not the way that has to be done. That really would have to be, it seems to me, identified as a mitigation measure and as a significant mitigation measure, that there be neighborhood representation on that ballpark traffic coordinating committee so that you can hear also from neighbors as to what would be the right way and the wrong way to do that...[T]he neighborhood needs to be included, we think, in devising the plans relative to this, and that must be identified as a mitigation measure in the draft EIR and at that point I think we can probably go back and actually work out something that will work. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

We need unpolitically motivated neighborhood representation in deciding upon mitigation and for the ongoing operations once the Ballpark is in use. (Louise Bird)

...input into this Plan must be granted to the neighborhood which will be bearing the introduction of 2-3 million fans yearly into an area already plagued by traffic tie-ups and parking deficiencies. Neighborhood groups, residents and others must be represented on the Ballpark Transportation Coordinating Committee, and they must be given real power to effect the plans developed by that Committee. Further, this Committee must be a permanent body for the life of the project, free to adjust and modify transportation plans as circumstances dictate. (Rick Mariano)

Response

As defined in the EIR on p. V.4, the Ballpark Transportation Coordinating Committee (BTCC) would consist of various public agency representatives. A number of comments have expressed the request that the membership be extended to include representatives of neighborhoods and other study area interests. The coordinating committee for the San Jose Arena includes such members, and has proven to function very well. The description of this committee in the EIR has been expanded to add the opportunity to include neighborhood representatives. In addition, the South Beach Park/Harbor, China Basin Building, Catellus, and the South of Channel waterfront and Mission Creek could have representatives. In addition a representative of the bicycle riding community could be included.

Care needs to be taken in defining the operation of this Committee: it should be large enough to encompass all the agencies and community interests that are affected by the ballpark, but it should also be able to be decisive and to move quickly to address ongoing needs. One of the first duties of the BTCC would be to review the TMP prepared by the Giants and the City, and suggest appropriate modifications.

The text of the EIR has been modified to clarify the above issues as follows. The following text has been added on p. V.5 at the end of the first partial sentence at the top of the page:

> **The committee also could include representatives of neighborhood, special interest groups, and property owners. Care should be taken to avoid creating such a large committee that appropriate actions cannot be taken quickly.**
>
> **The BTCC would have the responsibility of implementing the Transportation Management Plan (TMP). The ultimate objective of the TMP would be the efficient movement of people to and from, and within the vicinity of, the ballpark. Generally, the TMP would include measures to address transportation concerns including transportation demand management, transit use and improvements, pedestrians movement, traffic routing, and mitigation of impacts on area residents and businesses. This section of the EIR identifies a number of transportation improvements that would be representative of the types of measures that the TMP would define and the BTCC would consider for implementation. In addition the BTCC would have the ability to develop other measures as the need arises from time to time. A number of such measures were**

identified during the course of the preparation of the EIR. These were developed from suggestions made directly by commmentors on the EIR or as a potential response to an impact identified by a commentor. These types of measures are summarized on p. V.45 below under Other Mitigation Issues.

The last sentence of the first paragraph on p. I.48 has been revised as follows:

The committee also could include representatives of neighborhood, special interest, and property owner groups. The committee ~~It~~ would aid in establishing traffic routing plans and encouraging transit use and could aid in revising traffic mitigation based on experience with implementation.

The following text has been added on p. V.45, under Other Mitigation Issues as the first subsection, before "Special Events."

A number of improvement measures could be included in the overall Transportation Management Plan; some of them were suggested in comments on the Draft EIR. These measures could be considered by the Ballpark Transportation Coordinating Committee and implemented if conditions warrant and if funding is available.

- **adjust the traffic routing plan for time of day, as appropriate;**
- **coordinate and modify traffic routing plan and Transportation Management Plan based on ongoing changes in development and circulation that would occur with Mission Bay development;**
- **monitor traffic in Potrero Hill and South Beach residential neighborhoods, and consider temporary barriers or assigning PCOs to discourage ballpark traffic in residential neighborhoods;**
- **provide for access to China Basin Landing buildings and other uses located on streets temporarily closed as part of traffic routing plans;**
- **review effectiveness of special event-day traffic signal timing on a regular basis and adjust as necessary;**
- **recommend consideration of residential permit parking programs for residential neighborhoods near the ballpark site if they appear to be appropriate for further study;**
- **Assuming the meter replacement program planned by the Department of Parking and Traffic (DPT) is funded by the Board of Supervisors,**

residents and business owners in the South Beach area could request that the DPT install electronic (programmable) meters in commercial areas which could be affected by overflow parking from the ballpark. The neighborhoods could request that installation of meters in this area be given priority over other areas which are scheduled for meter replacement. Generally, existing commercial areas should be examined north of the Channel, roughly bounded by Fifth Street to the west, Brannan to the north, and The Embarcadero to the east. Once Mission Bay is developed the feasibility of installing programmable meters south of the Channel should also be investigated.

- If the City or the Port also installs programmable meters in commercial areas near the ballpark, the boundaries of the residential permit program should be coordinated with the locations of the programmable meters.

- Recognizing that permit parking programs are only as effective as their enforcement, Parking Control Officers could be assigned to enforce residential permit parking restrictions in the South Beach and Potrero Hill areas on game or event days. As discussed on p. V.6, Parking Control Officers (PCOs) would control and route traffic before and after ballgames or events. A portion of these officers also could be available before games to enforce parking restrictions and serve as a visible deterrent to potential violators. Shortly after a game or event begins, additional PCOs would be available to ticket illegally parked cars.

- Parking on Terry A. Francois Boulevard could be restricted to a 2-hour limit, which would be too short and inconvenient for ballpark fans. Enforcement would be necessary during games to make this measure effective. Non-ballgame users of the parking who wanted to stay longer than 2 hours would be inconvenienced.

- Special parking passes could be made available for businesses, the Pier 52 boat launching ramp and other key activity centers along the waterfront. Passes would be placed on the dashboard of the parked car during ballgames. Cars without passes would be ticketed during the game. Strict enforcement of the pass program would be necessary, as some abuse would likely occur by some ballpark fans.

- Parking meters with a 2-hour limit or programmable meters could be installed such as those used in Denver near Coors Fields. During games, the 2-hour limit would discourage ballpark fans. Non-ballpark related users could return to their cars and add money to the meter to extend their time limits. However, these parkers, especially those using the boat launch ramp, would be inconvenienced by having to "feed the meter"

every 2 hours. With the computerized meters, the time limits could automatically be extended during non-game time periods.

- **Within 5 years after opening of the ballpark, the project sponsor could develop a permanent parking plan, if necessary, to address the long-term parking needs of the stadium. The plan should identify a permanent plan to provide sufficient dedicated parking spaces, and should be integrated with other travel demand management strategies such as those described on pp. V.43 - V.45. Development and implementation of the plan should be coordinated with the Ballpark Transportation Coordinating Committee.**

- **Parking in off-street parking lots and garages located in South Beach could be restricted on game or event days to fans who have pre-paid parking passes that are displayed on the vehicle dashboard. Lot operators would need to have agreed to this in advance, and they and Parking Control Officers would be responsible for enforcing this measure.**

- **A series of small pedestrian guide signs could be developed and installed which would show pedestrians the most appropriate routes to the ballpark and guide them away from neighborhood areas.**

- **On Second Street between Townsend and Brannan Streets the effective sidewalk width should be increased through a program of removing and/or relocating street furniture and other obstructions.**

Comment

Traffic Routing Plan (p. V.12) - JPB and SamTrans representation on the Transportation Coordinating Committee is requested. Mitigating impacts on MUNI bus, Metro and CalTrain operations at 4th/Townsend is a priority. In addition, ensuring that regular SamTrans bus service on 6th, 9th, Mission Street, I-101 and I-280 operates on schedule is assumed. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

CalTrain was identified as one of the agency members of the Ballpark Transportation Coordinating Committee on p. V.5 of the EIR. This was intended to indicate inclusion of both the Joint Powers Board, that oversees CalTrain, and Samtrans. The Committee would be the forum for the transit operators to work out issues related to the reliability of transit before and after ballpark events.

Traffic Routing Plan

Comments

The intersection improvements summarized in the mitigation section seem unrealistically optimistic. (Philip DeAndrade, Mission Creek Harbor Association)

Maybe Pac Bell could use some of its extensive resources and high tech know-how to assist the City Traffic and Electrical Departments to devise traffic controls using metering lights, CCTV street monitors, radio links, etc. to help alleviate the mess. The whole post-game traffic concept has to be reworked and thought out in much more detail or it simply won't work. (Silva B. Creg)

Project must detail more effective traffic and circulation mitigation measures. (Michael Theriozere, Urban West Associates of San Diego)

This failing [lack of commitment or closure on mitigation measures] is the city's responsibility. Reading two pages, Chapter V.33 and V.34, titled *Permanent Mitigation Measures, Preliminary Routing Plan* effectively and efficiently makes this point. This section reads as follows:

*"While most of the recommended mitigation measures for the preliminary traffic routing plan would be temporary, usually before and after games, permanent measures listed below **should** be considered. **It is important to note** that **none** of these measures are part of the present programmed capital improvement plans of the City and County of San Francisco or any other public agency. As a result, there is no designated source of funds for these mitigation measures, and the source would need to be identified as part of the project review and approval process."* [Commentor's emphasis]

This section continues by identifying several "permanent" mitigation measures for which there is no known funding and concludes as follows:

"During the 3:30 – 4:30 p.m. period after a weekday afternoon game, seven intersections would remain at Level Of Service "F" and three would remain at LOS "E" (total 10 intersections at E and F) after the street improvements were in place, compared with 30 intersections which would be at level of service "F" during this period under detour and preliminary traffic routing plan without improvements, and with 22 intersections at LOS "F" under existing-plus-project condition (no detours or improvements)."

Translation, if we build the project and do nothing, 22 intersections operate at LOS of E or F. If we try and fix it with temporary measures, 30 intersections operate at LOS of E or F. If we spend an undetermined amount of money, from unidentified and possibly non existent sources to do permanent improvements, then 10 intersections operate at LOS of E or F. Here

we have a situation where doing nothing is preferable to trying to fix it, unless you are prepared to do it all! (James Haas)

If we summarize a big chunk of the document, it basically says that if build the project and do nothing, 22 intersections will operate at less LOS, which is a technical term I can never remember, of E and F. And if we try to fix them with temporary measures, 30 intersections operate at LOS, E or F. And if we spent an undetermined amount of money from unidentified and possibly nonexistent sources to do permanent improvements, then ten intersections operate at E or F. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Page V.13, Figure V.B.2: This figure shows all Embarcadero traffic being routed onto Townsend Street, which is a predominantly residential street between the Embarcadero and Second Street and has only one lane in each direction. This is a completely unacceptable traffic re-routing plan because of the significant negative impacts it would have on this residential neighborhood. (Table V.B.1 shows the Townsend/Embarcadero intersection at LOS F with this plan.) Instead, Embarcadero traffic should use Second Street between King and Townsend for the detour.

Page V.14, 15, Figure V.B.3: The northbound Bay Bridge post-game traffic from the dedicated parking lots should be encouraged to use the Fifth Street on-ramp, and possibly the Eighth Street on-ramp, rather than the Essex and Sterling Street ramps which have access across Second Street and are already over capacity in the P.M. peak period. The Fifth and Eighth Street ramps are high capacity, away from residential areas, and avoid blocking of Second Street, which serves as the local access route to the South Beach neighborhood.

Pages V.15, 17, Figure V.B.3: Post-game Embarcadero bound traffic should turn left at Townsend and Second, then left onto the Embarcadero, rather than being routed onto Townsend Street between Second Street and the Embarcadero, which, as noted above, is a two-lane only residential street. This is a completely unacceptable traffic re-routing plan because of the significant negative impacts it would have on this residential neighborhood. (Table V.B.1 shows the Townsend/Embarcadero intersection at LOS F with this plan.) (Steven L. Vettel, Residential Properties Group)

Parking and Traffic management are serious issues. How does the project sponsor propose to mitigate the impacts on the neighborhood? (H. James Schafer)

I am concerned that there will not be sufficient mitigation regarding...traffic...due to the additional pressures created by the ballpark fans and concert goers. (Elizabeth Carney)

Closure of both drawbridges and re-routing traffic is also a major pain to the neighborhood. (Maria Woodard, Orville Pitney, John H. Super)

1. The DEIR identifies the important arterials which serve the ballpark area, and these include the Embarcadero, King, and Second Streets. The DEIR does not identify Townsend Street as a "major arterial," instead labeling it a street on which diagonal parking serves the local residential neighborhood between The Embarcadero and Second (page III.76). Certainly, within the South Beach neighborhood, Townsend is configured and utilized as a local street rather than a "major arterial."

Yet when faced with the task of defining a pre-game and post-game traffic and circulation pattern, Townsend Street between The Embarcadero and Second assumes the "major arterial" status and is prescribed to serve as the key traffic link between The Embarcadero and the vicinity north and west of the ballpark (Figures V.B.2 and V.B.3). With the proposed closure of King between Second and Third, Townsend between Second and Third is identified as the route for Embarcadero traffic moving to and from the designated parking areas south of the Channel.

Townsend between The Embarcadero and Second is a local street serving local parking and access needs, and ballpark traffic should not be routed onto this section of the Street. Neighborhood accessibility, including specifically ingress and egress to residential and commercial uses, will be directly impacted by this prescribed traffic flow. Residences on this block of Townsend will also be impacted by traffic noise. This routing is not necessary since there is a simple alternative to this routing which will allow Townsend to retain its local street identity and function.

Pre-game Embarcadero traffic should continue south past Townsend to King, and move west one block on King to Second where it can be routed north to Townsend and then west on Townsend to Fourth Street. This routing pattern could be affected by an appropriate combination of signage, street blockage, and active enforcement by PCOs (see #2 below). Of course, post-game traffic could be routed in the opposite direction, but again using the same routing pattern which would utilize King between Second and The Embarcadero rather than Townsend.

This traffic pattern mirrors the proposed turning movement at the intersection of King and Third, where eastbound traffic is directed through a ninety degree turn to the north onto Third Street. This intersection is similar to King and Second in terms of pre-game and post-game street closures, so the desired turning movement could presumably be implemented with similar methods...

2. Bryant Street between Beale and Delancey has some unique characteristics which require careful monitoring and possible mitigation efforts. Because of the internal roadway design of the Bayside Village residential development, which occupies the block bounded by Bryant, Delancey, Brannan, and Beale, it is possible for ballpark traffic to move between Bryant and Delancey by passing through the development. Pre-game traffic moving from Beale and Bryant, or using the Federal alleyway (at Bryant), could access Delancey and Brannan in this manner. Consequently, it may be necessary to install signs or other traffic management tools

at these two locations to effectively discourage through traffic. It is possible that post-game traffic could seek the reverse of this route, but if the traffic control measures recommended for use on Brannan Street (at Second Street) are effectively employed, this impact could not occur.

Since the South Beach neighborhood is virtually surrounded by major arterials which serve as important routes for pre-game and post-game traffic, the ability of neighborhood residents, visitors, and commercial customers, to move to and from the neighborhood is a major concern. There are several specific comments which can be provided in this regard.

1. Second Street is a very important access route to and from the South Beach neighborhood. It is also designated a key traffic route for pre-game ballpark traffic southbound to Brannan and Townsend Streets (westbound to Fourth). Second Street is also identified as the southbound route for buses serving the ballpark, including the proposed "bus bridge" which would link Market Street (transit services) with the ballpark.

The DEIR suggests that PCOs be stationed on Second Street in order to facilitate traffic during those periods when congestion results (page V.51). This suggestion should absolutely be implemented, particularly with respect to those problems which are documented on Second at Bryant and Harrison, where traffic is seeking access to the Bay Bridge eastbound. Since both of these intersections will be in receipt of substantial traffic flows from eastbound traffic which was moving north on Third Street, active enforcement is the only method of assuring that the intersections are not blocked for north-south traffic flows. Non-designation of Second Street as a ballpark route for post-game traffic is acknowledged, although prohibition of left-turns at Townsend and Second by traffic eastbound on Townsend, is critical. (Douglas G. Wright)

Page III.8, Townsend Street: Note that the NE Waterfront Area Plan calls for closing Townsend Street to through traffic between Second Street and the Embarcadero. This is in direct conflict with the proposed street closure plan, which instead turns Townsend Street into a major arterial before and after ballpark events. (Steven L. Vettel, Residential Properties Group)

The intersection improvements summarized in the section on mitigation seem unrealistically optimistic. (Philip De Andrade, delegate of Mission Creek Harbor Association)

I think the single...biggest issue that we have is traffic. I think you have heard it from everyone. I think there is no disagreement on that. I feel very, very strongly the key to it is the traffic management plan. The plan that was used in San Jose for the San Jose Arena and at Coors Field have proven to be very successful. I know. I have been there. I have attended events at both of those venues, and they work...I understand that the San Jose model will be used as a starting point here in San Francisco.

I think it is time that we approve the environmental impact report and we get down to the business of taking the information in that report, developing a traffic management plan, and solving a lot of the traffic issues that we are hearing about today. (Bill Wigert)

I would...ask the Planning commission to put monitors, human monitors, at the freeway exits to ensure that ball fans do not inundate and terrorize our neighborhood with cars and traffic. (Sandra Peterson)

It should be the responsibility of the Giants to form traffic patterns not harmful to the neighborhoods. Campaign promises should be kept that this would be a pedestrian, public transportation and boat oriented facility. (Babette Drefke, Potrero Boosters & Merchants Association)

Keep cars activities and participants Downtown, as it was called a Downtown Stadium in the campaign. Attendees may expect to encounter congestion, delays and inconvenience for their special event. But residents shouldn't have to put up with it daily. Vermont turn-off is hazardous and should be forbidden use by ballpark attendees. Any routing plan should discourage intrusion into nearby neighborhoods. Who pays for the transportation coordinating committee? (Babette Drefke, Potrero Boosters & Merchants Association)

While a Transportation Management Plan has not been produced, we would like to offer that it be based on the following Planning Principles:...

Keep traffic and vehicles coming north of the Channel to the north, and traffic and vehicles coming south of the Channel to the south. Avoid Channel crossings by vehicles to the greatest extent possible. (James Haas)

Stadium traffic control officers at all intersections where the LOS has been downgraded. Close all side streets in the South Beach area to local traffic only (Brannan, Bryant, Townsend, Harrison, all east of Second). (Michael Karasik, Bayside Village Associates)

Another issue is Second Street. The EIR we think mistakenly uses Second Street as a major ballpark traffic route in and out of the ballpark. We think it ought to be reserved for transit, for charter buses, and for local traffic, whereas Third and Fourth Street would be much better handled at the ballpark traffic going to and from the parking lots. Third and Fourth are four lanes each way. Second Street is only -- a-two lane street, two lanes each way. We would like the EIR to consider that option.

A part of that option is using the Fifth Street on ramp to funnel a lot of traffic after on the Bay Bridge. Right now, that traffic is being funneled on to Second Street. (Steve Vettel, Bay Side Village Associates)

Use Third Street and Fourth Street as the local traffic loop, both one way streets, for major bus and car traffic from the north. Avoid Second Street because of 2 way nature and Bay

Bridge entrances and arteries. Station traffic control officers at each of the following corners before and after events: Brannan/Delancey, Brannan/Embarcadero, Beale/Bryant, Bryant/Delancey, Bayside Village Place/Delancey, Bayside Village Place/Bryant. None of these intersections was addressed in the EIR Draft, and all are material to the ability of Bayside Village's shuttle bus and car traffic, and our residents' quality of life. (Michael Karasik, Bayside Village Associates)

Response

The preliminary traffic routing plan described in the EIR is intended to provide a recommended example of a program to reduce impacts caused by traffic due to ballgames and events at the ballpark. Such plans are common for major events, and it is not appropriate to use such a plan to improve traffic at intersections. The EIR also provides an assessment of the potential traffic problems that would be caused by the traffic routing proposal and recommends possible strategies that would solve some of these problems. The project sponsor and the City would devise a more thorough traffic routing plan, taking into account comments and feedback from different agencies and local residential/business communities, as part of an overall mitigation program if one is required as part of conditions of approval. This plan would be part of an overall Transportation Management Plan (TMP) to specifically establish the operations of the transportation system serving the ballpark for ballgames and events. The plan would address issues such as how different public transit systems could operate to effectively serve the needs of ballpark patrons, interaction between public transit systems, and details of other parking/circulation issues, etc. The plan could also introduce special programs that would provide incentives for ballpark patrons to use public transit (e.g. a discount fare on BART with ballgame tickets). These points are discussed in the EIR on pp. V.3 - V.54. See also the discussion of transit incentives under "Transit Mitigation, Transit Incentive Program," below, in this section of Responses to Comments.

In order to clarify the objectives of the traffic routing plan the following text has been added to the EIR on p. V.6 after the first paragraph under "Traffic Routing Plan." The first three sentences of the next paragraph on page V.6 have been deleted.

The general goals of the traffic routing plan are as follows:

- **Direct non-project traffic to alternate routes to allow project traffic and other local traffic to use the streets leading to the ballpark and ballpark parking.**

- **Discourage traffic intrusion into nearby residential neighborhood areas to the maximum extent feasible.**

- **Maintain a reasonable level of access to all properties in the project area.**

- **Provide motorists with traffic detour and alternate route information prior to arrival in the ballpark vicinity.**

- **Disperse ballpark traffic quickly after games to a variety of traffic routes.**

- **Flexibly accommodate traffic conditions as they change due to different types and sizes of events at different times of year, different days of the week, and different times of day.**

Mitigation measures discussed in the Transportation Section of Chapter V have not been identified as part of the project because there has not yet been a formal commitment by the City or the project sponsor to carry out all or portions of the transportation management program described in the EIR. Reasonable and feasible mitigation measures must be disclosed in an EIR for potentially significant impacts such as those shown in the Transportation and Circulation Impacts analysis; those mitigation measures that have been included in the project must be so described (see, e.g., p. V.45, where a Motorist Information System is described as "part of the project") as required by CEQA Guidelines § 5126(c). Decision-makers will be required to consider all mitigation measures, including those not indicated as part of the project and either require that they be included as conditions of approval or reject them as infeasible. These findings are not part of the EIR, but are part of the decision-making process.

Even with the traffic routing plan a number of intersections would remain at level of service F as noted by several commentors. These are primarily intersections north of the Channel

and near the I-80/U.S. 101 freeway ramps, that are already at level of service F. Overall the routing plan disperses traffic, and although it may not mitigate conditions at one of these existing problem intersections, it would divert traffic away from that location so as to not worsen the problem. While the closure of the Third Street Bridge and other elements of the traffic routing plan would cause inconvenience for local area residents and businesses, the degree of inconvenience would be worst if ballpark traffic and other through traffic were allowed to attempt to move through the area without the proposed controls.

The routing plan proposed in the EIR is conceptual and would be subject to change to address changes in traffic conditions or impacts due to traffic intrusion. Streets such as Townsend Street between Second and The Embarcadero, Byrant Street between Beale and Delancey, and other streets in the South Beach and Potrero Hill areas could be controlled by barriers to limit traffic if conditions warrant.

The detour plans shown in Figures V.B.2 and V.B.3 (pp. V.13 and V.15) provide a schematic design for detouring pre-game and post-game ballpark traffic in the vicinity of the ballpark. The intent of these detour plans is to minimize potential conflicts between ballpark traffic and background traffic so that delay could be reduced. An effective detour plan would also increase the efficiency of exiting ballpark traffic so its impacts on neighborhood streets could be minimized. Dissipating ballpark traffic efficiently would be of particular importance for the time period following a weekday afternoon game, which could potentially extend into the peak commute period if there were substantial delays. Given the size and location of the project, these detour plans were also devised to ensure that there would be minimum ballpark traffic intrusion into nearby residential communities.

The format used for the two Figures (V.B.2 and V.B.3) on traffic detour and the extensive information provided make this subsection of the EIR somewhat complex. To provide clarification, the "recommended" and "mandatory" detour routes for ballpark and background traffic are separately examined and commented in this Response.

Non-Ballpark Traffic Routing

The "recommended detour" routes were devised in attempt to divert non-ballpark traffic to streets that are away from the ballpark so as to make room for ballpark traffic approaching the dedicated parking lots south of the China Basin Channel. The design of these detour routes took into account existing background traffic conditions, including during peak hours, and the importance of keeping major freeway access open for background traffic. Most non-ballpark traffic would likely follow the recommended detour routes because drivers would want to avoid congestion near the ballpark. Past research has shown that motorists generally find their way around to avoid traffic congestion when there is a known special event like a ballgame. Therefore, one of the main purposes of the "recommended detour" signs, which would be installed along major commute arterials like The Embarcadero, would be to remind motorists not destined for the ballpark to consider using alternate routes rather than joining ballpark traffic.

In fact, rather than "blindly" following their normal commute patterns, commuters in the downtown area are aware of different routes to access the major freeways (e.g. I-280, or a Bay Bridge on-ramp further west in the downtown) and other destinations to avoid congestion. They may also switch to other commute modes or alter their work schedules to avoid the crowd on ballgame or event days. This would result in a better overall traffic condition in the area than described in the EIR impacts analysis in Chapter IV, which reflects a "worst-case" scenario (i.e., assuming background traffic continues as in the existing traffic counts). With improved technologies (e.g. Intelligent Transportation Systems - ITS) that are newly available or that may become available in the future, motorists would be able to access detailed real-time traffic information (via their computers or the changeable message signs) so they could make the best decision when choosing their travel times and routes. These kinds of technological advances could be made part of the Transportation Management Plan by the Ballpark Transportation Coordinating Committee (BTCC) as they adjust the Plan for changing conditions and information (see the Response to Comments discussion under *Ballpark Transportation Coordinating Committee*). The BTCC would not be a funded public

agency, and representatives would participate at the expense of their agencies or interest group.

The "mandatory" detour routes, on the other hand, would serve as a last-minute barrier prohibiting unauthorized traffic as a consequence of temporary road closure. For example, both pre- and post-game detour plans described in the EIR call for a "mandatory" detour at the intersection of Townsend and The Embarcadero. If one only examines the figures, traffic flow on Townsend Street might seem like it would be overwhelmingly high since the street would be a "mandatory" detour route and readers might mis-interpret that as a mandatory path for "all" traffic from The Embarcadero. However, as discussed above, this route would be used only by local traffic and by those who have missed the previous recommended detour routes.

Ballpark Traffic Routing

The "Ballpark traffic" paths as shown in Figures V.B.1 and V.B.2, p. V.8, represent potential routes that would be taken by ballpark traffic to access the dedicated parking lots. These paths do not necessarily represent the actual routes that ballpark traffic would be using. Rather, they reflect the most likely paths of ballpark traffic so that the City, the sponsor and the Transportation Coordinating Committee could use them as a reference when devising the detailed traffic detour plan as part of the overall Transportation Management Plan. It is important to note that the degree of traffic impacts on each highlighted path depends very much on the actual amount of traffic on the street, which in turn would be determined by the trip origin/destination characteristics of ballpark patrons. For example, ballpark traffic traveling on The Embarcadero would likely be comprised mainly of fans from the downtown area and some from the North Bay. These numbers are relatively small compared to those coming from the South Bay/Peninsula and the East Bay, who would be expected to follow the most direct routes leading from/to the freeways. Therefore, the impacts on some local streets would not be as bad as one might think; for example, the

analysis of the detour plan in Table V.B.1, pp. V.19 - V.24, shows that intersections with The Embarcadero north of Townsend Street would operate at acceptable levels of service.

In fact, traffic in the entire area would naturally achieve some form of equilibrium, especially when people become familiar with the system as a whole. In other words, traffic would be dispersed evenly over the area on major streets and it is unlikely that a particular street would absorb most of the traffic. There would also be a limited amount of traffic seeking shortcuts in the neighborhood streets because such attempts would not generally provide time saving. This is because when traffic is evenly dispersed on major streets, delay on all of these streets is more or less the same. A neighborhood street would merely lead from one already-congested major street to the next, and would not provide an "escape," so the overall time to leave the congested area would remain about the same even if a driver attempted a "short-cut." The final detours and traffic routing plan should strive to evenly disperse ballpark traffic on major arterials so that impacts on local streets with a high density of residential and commercial activities would be limited.

Although it is not likely that major volumes of traffic would use local neighborhood streets because little time would be saved, it is reasonable to assume that some neighborhood streets would experience some increase in traffic because they are close to the ballpark site. Therefore, these streets are proposed in the EIR traffic mitigation program to receive some special treatment that other streets would not receive. For example, the proposed detour plans, as previously described, would discourage non-ballpark traffic from approaching the local streets near the ballpark (e.g. Townsend and Brannan Streets), and the reduction in background traffic on these streets, especially during commute hours, would probably compensate for the increase in ballpark traffic. In addition, the EIR adopted a conservative approach of assuming a relatively low percentage of ballpark attendees that would already be in the downtown area (approximately 20% for weekday afternoon games).

It is definitely appropriate to include as one consideration in a traffic routing plan attempts to keep traffic coming from the north to the north, and that coming from the south to the south

side of the Channel. It was assumed in the traffic analysis that many drivers coming from the North and East Bay areas and from the northern portions of San Francisco would choose to use parking garages and parking lots available in the South of Market and South Beach areas north of the Channel. Those choosing to park in the dedicated ballpark parking lots south of the Channel would find direct access via Fourth Street. Those arriving from the south, including from the southern half of San Francisco as well as the Peninsula, would most likely arrive either via I-280 or Third Street, as discussed above, and would remain south of the Channel by using the dedicated ballpark parking lots.

Chapter V of the EIR presents the level of service for study area intersections included in the proposed detour plans. As stated in the text, the detours would increase the number of intersections that would operate at unacceptable levels of service (i.e., LOS E and F), before any further mitigation measures are implemented. This could be confusing because the detour plan would change or "skew" the normal traffic pattern and could therefore cause more intersections to fail. Many proposed traffic mitigation and improvement measures in the EIR were designed to mitigate the "detoured" conditions, rather than the "regular undetoured" conditions. It is important to note that the "detoured" levels of service shown in Table V.B.1, pp. V.19 - V.24, do not yet incorporate any improvements, and should not be confused with the levels of service that are "detoured and mitigated".

See the response under "Traffic Impacts," *Freeways/Freeway Ramps*, above, for a discussion of directing traffic to the Fifth Street ramps to U.S. 101 in place of the Harrison/Essex ramp system and a discussion of Second Street and The Embarcadero as routes to the Sterling Street HOV ramp. A discussion of the Vermont Street ramp use is found in the response under "Traffic Impacts" *Potrero Hill Area Traffic*, above.

Comment

The text on page [V].9 suggests the implementation of changeable message signs on [the] northbound Route-280 as part of the traffic routing measures. Has this been discussed with Caltrans' office of Traffic Systems? (Harry Y. Yahata, Department of Transportation, Caltrans)

Response

Message signs have not yet been discussed with Caltrans staff. A Transportation Coordinating Committee is included in the EIR mitigation measures (see p. V.4); it would invite representatives from Caltrans to discuss implementation of changeable message signs on freeways as part of preparing a final Transportation Management Program and its traffic routing plan.

Comment

Page IV.170, USCF/Mission Bay + project: 35 of 66 intersections are at LOS F under this scenario after a weekday afternoon game, even after all planned roadway and signalization improvements. Do the proposed mitigation measures mitigate this significant impact? An earlier start time for weekday afternoon games needs to be explored. (Steven L. Vettel, Residential Properties Group)

Response

It is correct that under the UCSF/Mission Bay cumulative scenario for the weekday afternoon post-game (3:30 - 4:30 p.m.) period in the year 2015, 35 of the study intersections would be at LOS F. However, it is not correct to state that these conditions reflect conditions after the implementation of the proposed traffic mitigation measures. The mitigations and transportation improvements as presented in section V.B. would serve to reduce these impacts. However, it is likely that in the year 2015 with the currently planned transportation network, that a number of intersections would remain at LOS F. This would primarily be due to the impacts of the UCSF/Mission Bay project and not the ballpark. A plan for the transportation improvements that would be part of the UCSF/Mission Bay project is currently under development. One of the responsibilities of the Ballpark Transportation Coordinating Committee (p. V.4) would be to coordinate the operation of the traffic routing plan with the ongoing changes in development activity and circulative that would occur with the development of Mission Bay.

Comment

But the mitigation measures proposed in the DEIR are not just totally inadequate, they are downright evil and dangerous. They call for changing South of Market streets and signals to essentially turn all our neighborhood streets into a freeway to handle the increased traffic.

The result of the proposed "mitigations" would be that every intersection in the South of Market will be made more dangerous for pedestrians, including the 1,800 elderly and disabled tenants of Yerba Buena. This is absolutely unacceptable, and if necessary we will sue the City to stop it from happening.

Everyone knows what the two real mitigation measure are that we all need to solve both the traffic and safety problems in the South of Market simultaneously:

1. Put "traffic control officers" (TCO's) at every intersection every day for at least four hours or longer. This costs about $50,000 per year per intersection.

2. Install the "red light cameras" at every intersection to catch the light jumpers, and also add cameras to catch drivers who violate the "no turn on red" rules at crucial intersections near Moscone Center with huge pedestrian loads.

The extra costs of the cameras and TCO's will be more than paid for by the additional traffic fines the cameras will generate. So there is absolutely no reason not to adopt and implement these two obvious mitigation measures. The only question is why they are not included in this DEIR. (John Elberling)

Response

First, signal timing would be optimized only at intersections that would be prone to large increases in ballpark traffic. DPT already operates all signals in the City with different timing plans during a day to ensure maximum efficiency, and DPT would continue to monitor the operation of all signals and ensure that sufficient pedestrian crossing time is allocated at each intersection. Second, in the preliminary traffic routing plan described in Chapter V of the EIR, reversing traffic flow direction would only happen on a short segment of Fourth Street between Third and Townsend Streets, well south of the Yerba Buena Center area, and there would be Parking Control Officers (PCOs) on site to ensure a safe and efficient operation. The installation of red light cameras, while an important feature of the City's traffic safety program, would not be a necessary or appropriate mitigation measure for impacts caused by ballpark traffic. Stationing PCOs at every South of Market intersection on

an every-day basis is not a measure that would be related to ballpark transportation impacts, as events would not occur in the ballpark every day of the year, or every weekday. Therefore, these suggested measures have not been included in the EIR.

Comment

The mitigation should not be to close King, Townsend and Third Street north of Sixteenth Street to local traffic. The solution is to implement and enforce the Transit First policy of San Francisco and have no additional parking for the ball park. The whole purpose for building a downtown park was so that San Franciscans would have a ballpark to which we could walk or take public transit. If there are so many people needing to drive cars from outside The City to this ballpark, it is in the wrong place! (Janet Carpinelli)

Response

Closure of portions of King Street and Third Street near the ballpark would be consistent with the Transit First policy, as it is intended to eliminate conflict between auto vehicles and transit and to provide adequate space for loading transit vehicles.

Comment

3. Second Street is a key arterial serving South Beach neighborhood access needs, and so relieving Second of ballpark traffic congestion before and after games is very important. One method of supporting this objective, as well as reducing traffic volumes on Third Street, would be to route post-game traffic to more effectively utilize the I-80 eastbound on-ramp at Fifth (and Bryant) should be considered. Traffic volumes and analysis of this intersection (Table V.B.1) for weekday day games suggest that this routing would not be effective for these games, but the same information suggests that it would work successfully for evening games and weekend games (with a signal timing modification, as noted in the DEIR, Table V.B.1). Modifying the traffic routing plan in order to facilitate northbound traffic on Third Street to move west to Fifth Street via Brannan could encourage this increased utility of the Fifth Street on-ramp. (Douglas G. Wright)

Response

The routing plan as presented in section V.B of the EIR is conceptual and would need to be developed in more detail by the Ballpark Transportation Coordinating Committee (BTCC). For example, the plan in the EIR is essentially the same for each game time scenario. In actual practice, there would be a different plan for weekday afternoon games than for

weekday night or weekend day games. As one commentor noted for weekend and weekday night games it might be more effective to route traffic bound to the eastbound I-80 freeway after games to the Fifth Street on-ramp rather than to Second Street as indicated in the plan.

Traffic Routing on Potrero Hill

Comments

Although the Giants ball/concert park will be located North of the China Basin Channel, the 5,000 space dedicated parking lots will be located on the South side of this channel. (See page 5, figure II.D.5). This fact will encourage large numbers of fans who travel up from the Peninsula (the Peninsula is one of the Giants' largest fan bases (See page 6, Figure X.C.3) to exit on the South side of the channel where the parking lots are located. Potrero Hill is the neighborhood located in this area and will, thus, be the neighborhood most significantly affected by this traffic.

The Draft EIR states that "the traffic routing plan also should discourage traffic intrusion into nearby residential neighborhood areas" recognizing the importance of routing traffic away from residential areas. However, after acknowledging the importance of this objective the Draft EIR continues on to recommend that spare and wholly inadequate measures be applied to the neighborhood of Potrero Hill. (Sarah Ames)

The DEIR states that the traffic mitigation measures that will be necessary in Potrero Hill include:
1)"Detour signs would also be posted, as necessary, on I-280 south of Mariposa Street to guide motorists to alternate ramps (e.g., Cesar Chavez or Sixth Street)."
2)"Install a permanent guide sign on northbound U.S. 101 approaching Vermont Street off-ramp as follows: *Giants Ballpark Traffic Use Seventh Street Exit.*"
3)"Install a permanent guide sign on the northeast corner of Vermont and Mariposa Streets directed toward off-ramp traffic with a directional arrow toward northbound Vermont Street as follows: *Giants Ballpark Traffic Use Vermont Street->.*"
4)A mandatory northbound traffic detour would exist at the bottom of the Mariposa Street exit from I-280 and a PCO would monitor traffic here.

To summarize, the DEIR provides a few signs, one barrier and one PCO as protection for the whole of Potrero Hill from the 50,000 fans who will be attempting to reach the China Basin Stadium and South channel parking lots on event days.

These mitigation measures are inadequate and should be replaced with more effective measures. (Sarah Ames)

One of the things I was thinking, probably will never happen, maybe Vermont Street needs to be closed during the ball games, or maybe there has to be a barrier that is permanent so that all the traffic has to go down to a more commercial area, like 16th Street. But I think something has to be done so that the neighborhood is not split in half. (Yvonne Gavre)

We would like to see some plans that [are] made by the Giants as to where and how these people are going to get out of their cars and walk to the ballpark. We don't mean park your cars on Potrero Hill and then walk. (Babette Drefke, Potrero Boosters and Merchants Association)

I think the mitigation measures for the Vermont Street exit was to put a sign up that says "ballpark traffic turn left here." I would propose and hope that there is something a little more forceful than that. Perhaps those little yellow flexible barriers that you can drive over, maybe a guy standing there, you know, saying, "Ballpark traffic, you have got to go this way." Otherwise, there is going to be a steady stream of traffic down our street, straight down the middle of Potrero Hill. (Peter Bouton)

Having sat on the committee, I know there are no plans for how the traffic should go. I have been asking for it, I wanted a map, okay, let's plot the plans out, but we haven't done that yet. We just kind of get shoved aside, our vote does not count much because we are only there while the ballpark is there. But that is going to take a long time. (Babette Drefke, Potrero Boosters and Merchants Association)

The Planning Commission must insist that the EIR address the traffic, parking and congestion problems that will occur on Potrero Hill. There are several possible solutions: Monitors should be positioned at Mariposa, Vermont, and Caesar Chavez exits and direct ballpark traffic away from Potrero Hill. Pennsylvania Avenue should be blocked off for nonresident traffic at Caesar Chavez and Mariposa exits. Parking permits should be given to residents of Potrero Hill, (free of charge), and only 2 hour parking permitted on event days for non permit holders. (Jerry A. Peterson)

Response

The detour plans under pre- and post-game conditions as shown in the EIR (Figures V.B.2 and V.B.3, pp. V.13 and V.15) adequately assessed potential impacts of ballpark traffic in the Potrero Hill neighborhood, and the recommended detour plans would appropriately minimize those impacts and provide an effective circulation scheme for ballpark traffic. The project sponsor, the City and the Transportation Coordination Committee would develop a more thorough detour plan and work out the details for the plan (e.g., where and how many PCOs should be placed at which intersection) as part of a Transportation Management Program, if one is required as part of project approval. Specific issues on how specific

details on how the preliminary traffic routing plan described in the EIR on pp. V.7 - V.17 would affect Potrero Hill are as follows.

Pre-Game Conditions - Under the preliminary traffic routing plan, traffic guide signs would be posted on both I-280 and U.S. 101 at locations south of where the two freeways split to direct ballpark traffic to use I-280. There would also be signs on I-280 directing ballpark traffic to take the Mariposa Street exit. Upon exiting the freeway, drivers would follow a special detour route that would eventually lead to the dedicated parking lots. Parking Control Officers (PCOs) would be stationed at the ramp intersection on Mariposa Street and the intersection of Mariposa and Third Streets to direct traffic since a PCO could assign the right-of-way to traffic according to needs and would be more efficient than a signal. Existing traffic volumes along the above-mentioned path during "pre-game" hours (e.g., 6:30 - 7:30 p.m.) are relatively low; and combined with the detour plan (with PCOs on duty), this route would obviously be the "quickest" leading to the ballpark. Thus, there would be no incentive to find short-cuts through neighborhood streets on Potrero Hill.

For the ballpark traffic that was assumed to be using U.S. 101, guide signs would be posted along the freeway to recommend that drivers use the Seventh Street exit, as opposed to the Vermont Street exit. Should they choose to use the Vermont Street exit, a permanent guide sign could also be posted on the northeast corner of the Vermont/Mariposa intersection to direct ballpark traffic to continue northbound on Vermont Street and then turn on Sixteenth. At this point, it is important to note that it is extremely unlikely that ballpark traffic would travel eastbound on Mariposa Street (after they exit from Vermont Street) since they would otherwise be "competing" with other I-280 off-ramp traffic.

Post-Game Conditions - Since there is no easy/direct access to U.S. 101 from the dedicated parking lots, South Bay/Peninsula traffic would be expected to use I-280 exclusively. Under the recommended post-game detour plan, ballpark traffic would be directed (with assistance by PCOs and guide signs) to use the Mariposa ramp; this path would also be the most convenient and quickest one to access the freeway.

Overview - If the traffic routing plan offers a convenient, time-saving route for traffic to access the freeway, most motorists would not bother to drive around the neighborhood streets to look for short-cuts that might take longer than the regular detour route. In fact, the most direct and shortest path between the ballpark parking lots and freeway ramps is from Third (or Illinois and Terry A. Francois) to Mariposa Street, especially when PCOs are assigning right-of-way manually (which would substantially reduce delay and increase capacity at the intersections). Intruding into the neighborhood streets would not offer any clear advantages. Under both pre-game and post-game conditions, some motorists might choose to travel on Third Street to access the Cesar Chavez Street ramps. These vehicles would be unlikely to find short-cuts on neighborhood streets because Third Street provides a more direct route with less delay. In short, there would not be any obvious increase in traffic volumes on most residential streets.

One of the responsibilities of the Ballpark Transportation Coordinating Committee (p. V.4) would be to monitor traffic conditions in the Potrero Hill neighborhood. If, for some reason, ballpark traffic began to intrude onto residential streets, the Committee should considered the applications of more direct controls on traffic. For example, as one commentor suggested, barriers could be placed at the entrances to these streets, and/or PCOs could be assigned to discourage ballpark traffic from using these streets.

For additional discussion on how the detour plans might affect the Potrero Hill area, please refer to responses to comments on Traffic Impacts, *Potrero Hill Area Traffic*.

Comment

Mariposa Street, two-way operation in traffic routing plan: The proposed traffic routing plan in the DEIR calls for one-way operation of Mariposa Street to accommodate highly directional pre- and postgame traffic flows. We believe that this proposal would severely impact Mission Bay residents and users. We request that additional traffic analysis be performed to reflect two-way operation of Mariposa Street in the traffic routing plan. As part of the analysis, identify potential mitigation measures, if warranted, that would lessen the severity of any impacts. (Donald M. Parker, Vice President, Catellus Development Corp.)

Response

Two-way operation (as opposed to one-way) on Mariposa Street would have some negative impacts on the level of service at the intersection of Third and Mariposa Streets. The final traffic routing plans might be able to take advantage of some of the roadway improvements south of the Channel as part of the Mission Bay project, and the traffic routing plans might also need modification depending on the layout of the future Mission Bay developments (e.g. access points must be taken into account). Because a formal draft plan for Mission Bay south of the Channel has not yet been prepared and submitted to the City, it is premature to attempt to propose these modifications for inclusion in the ballpark EIR. These issues could be discussed further in any environmental review prepared for proposed revisions to the Mission Bay planning area and subsequent approval actions. The determinations of appropriate modifications to the traffic routing plan would most appropriately be made by the Ballpark Transportation Coordinating Committee at the time that Mission Bay development progressed enough to cause changes in the circulation system in the area.

South of Channel Area Traffic Routing

Comments

Surely not many had given a lot of thought to the logistics of transportation, except parking. Now it is clear that parking is only one major problem. Even if a huge area below China Basin were set aside for adequate parking, the problem of getting to and from it would remain, and that is a very serious problem indeed.

In the future, as the south waterfront redevelopment program progresses, there may be an opportunity to improve the outlook for adequate traffic flow to the site. (Perhaps this is already in the planning stage.) Illinois Street runs straight north from Army to Terry Francois and China Basin. Some fine day, it could be a broad boulevard, its path landscaped as a park, with water to the east and the yacht harbors and segmented parking areas to the west (including the big triangle of land west of 3rd Street and east of 4th), a few licensed commercial concessions to help pay the bills and pleasant walkways leading to the ballpark and other attractions.

Access from the Bay Bridge and from the northwest would still be a problem to solve, but eventual widening of streets leading to the northern Embarcadero might lessen the latter problem. (Charles M. Clark)

The Bay View Boat Club, the Mariposa/Hunters Point Yacht Club, and the Pier 52 Public Launch Ramp are all on Terry Francois Blvd., and all have or are planned to have small docking facilities, which might be able to be used for temporary alternate berthing facilities to minimize bridge openings. This assumes that Terry Francois Blvd. is not turned into an exclusive access road for ballpark parking, which would eliminate these options. South Beach Harbor probably could not be used, as access and parking are certain to be severely adversely impacted by the ballpark without adding temporary users. (Corinne Woods)

If ballpark traffic were not routed via 4th Street and the Peter Maloney Bridge and if it were kept off 3rd and 4th Street north of 16th Street, residents, boaters and other non-ballpark users would have waterfront access to and parking on Channel Street and Terry Francois Blvd. (Corinne Woods)

Section V - Mitigation Measures, begins with a quotation about "smart advance planning." Well, the proposed mitigation measures are not looking far enough in advance. They don't seem to go beyond rush-hour, and they certainly do not take into consideration the existing maritime uses along the China Basin Shoreline.

In Section V.B. - Transportation and Circulation, not one of the mitigation measures addresses the impacts to existing uses along China Basin Shoreline. Second, the Preliminary Traffic Routing Plan (Pre-Game Project Traffic Routing Plan and Post-Game Traffic Routing Plan) recommends using Terry Francois Blvd. for ballpark traffic. As shown in Figures V.B.2 and V.B.3, this street would become four lanes of one-way travel. Presently, this street is two traffic lanes with two-way travel and parking on both sides. Changes to this configuration will impact existing uses.

The impact of the mitigation measures upon existing waterfront uses should be evaluated and alternative mitigation measures should be developed which avoid these impacts. (Jeffrey Brown)

Parking alternatives should be seriously studied and mitigation measures that preserve existing and future waterfront access to maritime uses (such as barriers to ballpark traffic and parking along the waterfront), must be included and funded in the project plan without inordinate financial burden on existing users. (Corinne W. Woods, Secretary, Bay View Boat Club)

Do not under any circumstance devote Terry Francois Blvd. as access to the parking lots (this is one of the proposed mitigation measures in the D.E.I.R.). This street should be reserved for shoreline uses. As an alternative, develop Illinois Street or create new streets to improve access to and from the parking lots. (Jeffrey Brown)

Response

The traffic routing and detour plans shown in the EIR (Figures V.B.2 and V.B.3, pp. V.13 and V.15) show potential travel paths to and from the dedicated parking lots. It was assumed in the analysis of the traffic routing plan that these dedicated parking lots would be accessible via any one of the three north-south routes: Third Street, Illinois Street, and Terry A. Francois Boulevard. The layout of the parking lot access points should also take into account the most effective way of distributing the 5,000 vehicles that would use the dedicated parking lots and should be designed in a way such that severe delay would not occur on any particular street(s).

Note that the impacts analysis of the traffic routing plan did not assume any street closure for exclusive use by ballpark traffic; any driver could use any of the streets in the area, but non-ballpark traffic choosing to do so would experience delay. Therefore, there would not be any restriction to access existing land uses, although traffic bound for those uses would be inconvenienced by the additional congestion from ballpark traffic near the parking lots.

Vehicles would be arriving at the parking lots from both the north and south side of the Channel, but only those arriving from the south could/would access the dedicated parking lots via Terry A. Francois Boulevard, along with Third and Illinois Streets. This means that Terry A. Francois Boulevard would be used by approximately one-third of the traffic from the south (about 700 cars after a weekday afternoon game). The Giants parking lot attendants would keep track of parking space availability so that a "Parking Full" sign could be placed at the intersection of Mariposa Street and Terry A. Francois Boulevard to prevent excess ballpark traffic from using the street.

For more detail about traffic operations on Terry A. Francois Boulevard under the preliminary traffic routing plan and measures that would assist in providing access to waterfront land uses along this street, see the response in Traffic Impacts under *South of Channel Area Traffic*.

Street Closure/Barriers

Comments

Page V.5, Traffic routing: The routing strategy should include routing traffic away from predominantly residential streets, as well as away from the area immediately adjacent to the ballpark. Brannan and Townsend Streets between Second and the Embarcadero, Delancey and Beale south of Bryant, and the lower (southern) portion of Bryant Street between Beale and Delancey should be reserved for local residential and business traffic.

Page V.7, It is unclear how "passive barriers" would prevent ballpark patrons from using residential streets. There must be a more reliable means to restrict these streets to local traffic, such as PCOs at the key barrier points. (Steven L. Vettel, Residential Properties Group)

Page V.11: Local Traffic Only should not be limited to only one block of Brannan Street and South Park. Townsend between Second and the Embarcadero, Delancey and Beale south of Bryant, and the lower (southern) portion of Bryant Street between Delancey and Beale also need protection. A barrier should also be erected at Rincon Street south of Bryant Street to prevent patrons from entering the residential neighborhood from Rincon/Federal Streets. If unattended barriers are insufficient, PCOs must be posted at these intersections. (Steven L. Vettel, Residential Properties Group)

...2. During both pre-game and post-game periods, traffic attempting to move between Second and Fourth Streets and The Embarcadero will, in the face of any stoppage on the designated routing, seek alternative routes. This means that Townsend, as well as Brannan and Bryant, will be vulnerable to use by ballpark traffic seeking to find "shortcuts" through the neighborhood in order to avoid congestion on the major arterials.

The DEIR indicates that with respect to Brannan at Second Street, during the post-game period "...barriers, chains, and a No Ballpark Traffic sign...." be placed at this location if the monitoring of traffic conditions warrants (Page V.11) Without these measures, and/or the possible employ of a PCO, it is very likely that ballpark traffic will seek to use Brannan Street for through traffic movements. Although use of chains is problematic with respect to neighborhood access, other types of mitigation measures are quite appropriate, and should also be employed at Brannan and The Embarcadero during pre-game periods.

The same types of mitigation measures should be employed at Townsend at Second during post-game periods and Townsend and The Embarcadero during pre-game periods. The specific choice of traffic management method - movable barrier, PCO, cones - should be defined by the Transportation Coordinating Committee. However, it is certain that these traffic impacts will be felt to some degree at the various locations which are susceptible and so management techniques should be employed and tested beginning with the first game. (Douglas G. Wright)

4. In conjunction with the transportation management methods proposed to insure that ballpark traffic not move through the South Beach neighborhood on local streets, it is important that access to and from the neighborhood not be obstructed, at the same time. Although it is understood that experience with management techniques will allow adjustments, over time, it is important to recognize that techniques which absolutely prohibit entry to the neighborhood, such as chains, are not acceptable. Residents and commercial outlet operators must be provided with access at the various entry points to the neighborhood. (Douglas G. Wright)

Resident Proposed Traffic Mitigation Measures

1) Parking [C]ontrol Officers and Physical Barriers with "drive over" ability, i.e. a solid looking post that in reality can slowly be driven over, with an accompanying sign that reads "residents and emergency vehicles only. $200 fine." These PCO's and barriers should exist at a minimum at the following intersections before events and should direct traffic away from residential streets:

*Vermont/Mariposa Streets
*Pennsylvania/Cesar Chavez Streets
*Pennsylvania/Mariposa Streets
*Vermont/Seventeenth Street

And at a minimum at the following locations after events:

*Pennsylvania/Mariposa Streets
*Third/Eighteenth Streets
*Sixteenth/Seventh Streets
(Sarah Ames)

I think it is important -- you saw all those residential projects which are mainly east of Second. The EIR does not address the closure of those streets. We feel that several of those streets need to be closed. (Mike Gray)

I want to make a couple of transportation comments. We believe a major goal of the mitigation program needs to be keeping ballpark traffic out of the South Beach neighborhood. We don't think the DEIR adequately does that.

For example, the EIR recommends that Townsend Street become a major detour route for ballpark traffic. Townsend Street in the South Beach neighborhood is a major residential street. We believe that that is counterproductive to what we need to do. We would suggest that Brannan, Townsend and a portion of Bryant Street all be blocked from ballpark traffic and be used for neighborhood resident and business traffic and parking only. (Steve Vettel, Bay Side Village Associates)

Response

The EIR proposes temporary closure of a few streets and placement of barriers near local residential streets in the preliminary traffic routing plan to discourage ballpark traffic on neighborhood streets and to improve pedestrian safety near the ballpark site. It is important to note, however, that limiting access to local streets may not always be the most desirable and effective solution. It is understandable that residents and businesses in the neighborhood of the ballpark would like minimal ballpark traffic intruding into their nearby streets to find shortcuts or use their already limited parking spaces. Intuitively, the application of street closure and barriers could restrict auto access effectively. However, any street closure plan (including the use of street barriers) should be carefully devised and applied on an as-need basis.

In other words, putting barriers on too many streets could actually cause some impacts and potentially bring more inconvenience than benefit to the neighborhood from a traffic circulation standpoint. As a result of street closure, vehicles have to drive around the area to find alternate routes. These alternate routes might already be congested, and by adding more vehicles on these streets could create additional congestion which would delay not only traffic on those streets, but could paralyze the entire street network. For example, the traffic routing plan detour recommended in the EIR assumed that most background (i.e., non-ballpark) traffic would be detoured to other arterials to make room for ballpark traffic on roadways near the South Beach area. Consequently, traffic destined for the local neighborhood would also experience longer delay if there were barriers that sent the local driver to these "non-ballpark" streets, as fewer streets would be available for all traffic. However, the routing plan in the EIR is conceptual, and additional streets could be closed by the Ballpark Transportation Coordinating Committee, if warranted.

Concerns have been expressed by local residents that ballpark traffic would increase delay on their streets so they would like to install barriers on some of the streets in the area. While this would reduce traffic on their streets, ballpark traffic would then be required to share the "other" streets with other background traffic, so congestion on those streets would worsen substantially and it would take more time to get to and from the South Beach area.

Therefore, there would not be any real time-savings for anyone in the system. This is particularly true following a weekday afternoon game, just prior to the afternoon peak period, since background traffic already queues up on some streets at times. With street barriers, these "open" streets would experience more traffic than usual, and it would take a longer time for anyone (both residents and retail customers) to arrive at the South Beach area, and this could be highly undesirable for both local businesses and residents. (For example, if Brannan Street were closed now during the afternoon rush hour, there would be more cars on already-congested Harrison and Howard Streets, and delay at intersections leading to the South Beach area would increase).

Therefore, the value of any street closure or barriers should be thoughtfully assessed before implementation in order to ensure minimum impacts on the transportation system as a whole.

In addition, it is important to understand that any barrier or barrier devices to be employed would be temporary and "passive" as noted on p. V.7 of the EIR. The term passive means that any traffic that truly desires to enter a certain street can drive by the barrier device. The use of such devices as posts and chains, concrete barriers, or other devices which physically cut off all access to a street would not fit this definition.

The Transportation Coordinating Committee should constantly study the effects of any street closure/barriers on traffic in order to maintain an efficient traffic routing plan. A detailed Transportation Management Plan would recommend a more complete traffic routing plan with street closure issues discussed in more detail.

Closure of Third Street at Lefty O'Doul Bridge

Comments

The DEIR also recommends:

- Fourth Street between Townsend and Third Streets would be converted to one-way southbound during the hour before games (V.12), and

- The section of Fourth Street between Third and King Streets would be converted to one-way northbound after games. (V.14)

Since 3rd Street will be closed to vehicle traffic, using 4th Street and the Peter Maloney bridge for one-way ballpark traffic would make access to local residential, business and waterfront uses south of the Channel impossible. Southbound ballpark parking traffic north of the Channel before games should be routed east to 7th Street, as should northbound ballpark parking traffic after games. We suggest the following change:

- For the hour before and after games at the ballpark, place barriers across Fourth Street at the intersection of King Street, permitting only transit, shuttle and emergency vehicles and local, non-ballpark traffic (controlled by PCOs) to access the Peter Maloney (4th St.) Bridge.

That would keep ballpark traffic away from narrow and congested bridges. It would also minimize the impact of any necessary bridge openings that could not be scheduled outside peak ballpark traffic times. (Corinne Woods)

The rationale for closing the bridges to vessel traffic in the DEIR includes the impact of up to 13,000 pedestrians plus transit/light rail crossing the 3rd Street (Lefty O'Doul) Bridge, and using 4th Street across the Peter Maloney Bridge for one-way traffic southbound before games and northbound after games. As traffic mitigation, the DEIR includes recommendations:

- (V.9) "For the hour before and after games at the ballpark, place barriers across Third Street 100 feet (ft.) south of the south end of the Lefty O'Doul Bridge and on the south side of the intersection of Third/Berry Streets to block vehicle access to the bridge."
- (V.9) "...use PCOs...to enforce the mandatory detour around the Lefty O'Doul Bridge."

We suggest these be amended to:

- For the hour before and after games at the ballpark, place barriers across Third Street <u>at the intersection of 16th Street and across 6th Street at the intersection of 16th Street</u>..., permitting only transit, shuttle and emergency vehicles and local, non-ballpark traffic (controlled by PCOs) to access Third Street, Fourth Street, Sixth Street, Channel Street, Mission Rock Street and Terry Francois Boulevard north of 16th Street and south of China Basin Channel.

This would prevent ballpark and other through traffic arriving from the south and trying to get across the (closed) Lefty O'Doul from getting caught north of the intersection of 3rd and 16th Streets, and being forced to detour through the Mission Bay and Mission Creek Harbor neighborhoods to get back to 16th Street. (Corinne Woods)

Environmental Impacts of Mitigation Measures Lack Analysis: The impact of the one Transportation Mitigation Measure on the CBL Office Buildings was not discussed. The

only ingress to the CBL Office Buildings would be southbound down Fourth. Egress from the CBL Office Buildings before games could only move out across the Peter Maloney Bridge to Mission Bay South of the Channel. CBL Office Buildings will be further isolated by an exclusive Taxi drop off on Berry. The City and County of San Francisco requires the CBL Office Buildings through their project approvals to provide a shuttle for its employees to the downtown area. This shuttle is not discussed in the DEIR. The only mention of CBL Office Building is that "vehicles destined for China Basin Buildings would be permitted to use Third Street South of King." (DEIR V.16). The impact of this proposed mitigation measure to the CBL Office Buildings must be discussed and special provisions to accommodate tenants and visitors to the CBL Office Building should be included in the mitigation measures. An EIR may by determined to be inadequate if the discussion of an environmental issue in nonexistent. Laurel Heights Improvement Ass'n v. Regents of University of California, (1988) 47 Cal.3d 376. (David P. Cincotta, representing China Basin Landing, Ltd.)

Response

One of the major goals of the detour portion of the preliminary traffic routing plan is to provide ballpark traffic the most direct route to the dedicated parking lots so that its impact on non-ballpark traffic can be minimized. Safety of non-auto users (e.g. pedestrian and bikes) was also a key factor when devising the plans. The preliminary traffic routing plan in the EIR suggests that the Lefty O'Doul (Third Street) Bridge be closed during the hour before and after ballgames. This would provide pedestrian and bikes a safe and efficient path to cross the Channel and access the parking lots. In addition to the safety issue, the detour plans also took into account the estimated travel patterns of ballpark traffic (e.g. origin/destination data) and existing background traffic conditions. With Lefty O'Doul Bridge closed, the Peter Maloney (Fourth Street) Bridge becomes the most direct route leading to the parking lots from north of the Channel, while traffic from the south would use primarily I-280, Mariposa Street and Third Street. Since ballpark patrons would be coming from all directions, it is the intent of the detour plan to keep these vehicles as dispersed as possible so their impact on any single street could be reduced, but at the same time provide for pedestrian safety. The dispersion of ballpark traffic would reduce noticeable increases in traffic volumes on local streets in a particular neighborhood.

The proposed closure of the Lefty O'Doul Bridge would not preclude non-ballpark traffic from accessing sites near the Bridge along Third Street. It was perhaps misunderstood that the ballpark traffic routes shown in Figures V.B.2 and V.B.3, pp. V.13 and V.15, would be reserved for ballpark traffic exclusively. In fact, those are the paths that ballpark traffic would be recommended to take BUT drivers wishing to access sites other than the parking lots would still be allowed to do so. However, traffic congestion near the ballpark parking lots could slow access to nearby uses such as warehouses and recreational uses on Third Street, Fourth Street and Terry A. Francois Boulevard. While non-ballpark traffic could still travel on these ballpark routes, it was assumed that those with destinations outside of this area would avoid ballpark traffic and use other alternate routes.

The Transportation Management Plan (TMP) would need to develop detailed plans to maintain access and egress to properties that would be affected by proposed street closures, bridge closures and traffic routing, when the plan establishes the list of needed closures. The China Basin Landing Office Buildings (CBL) would require this type of special consideration, as would the buildings across King Street from the ballpark site. Impacts of the proposed mitigation measure were, in fact, discussed in the EIR. As noted in the EIR on p. V.16, although Third Street would be closed south of King Street before and after events at the ballpark, vehicles destined for the China Basin Building on Berry would be permitted to use Third Street, and transit vehicles would be allowed to use closed portions of King and Third Streets. Page V.52 notes that the Parking Control Officers would be trained to give priority to all buses. Thus, the CBL shuttle would be permitted to carry out its regular route if that were determined to best serve building tenants. The second sentence in the first full paragraph on p. V.52 has been revised to include the words "and shuttles" for clarification:

> **PCOs at the intersections along these streets would be trained to provide priority to buses, and shuttles and emergency vehicles in controlling the operations at these intersections.**

The fourth bulleted item on p. I.49 of the EIR has been revised as follows:

position PCOs at busy intersections to monitor and direct traffic, providing priority to buses, shuttles, and emergency vehicles;

The CBL building management may, however, choose to discuss with the Ballpark Transportation Coordinating Committee the need to revise the shuttle route before and after games or events at the ballpark, and the type of instructions provided to Parking Control Officers at the King/Third Streets intersection to insure traffic and shuttle access was maintained to Berry Street at CBL. For example, signs announcing closure of Third Street could also indicate "CBL Building Tenants/Visitors Excepted" from the street closure. The Transportation Management Plan would also need to address the details of taxi/limousine use of Berry Street to be sure that access was maintained for CBL visitors and tenants. These details would be best established with the Transportation Coordinating Committee, including input from affected businesses in the area.

China Basin Channel Bridges

Comments

Third and Fourth Street bridge closure is assumed. There is no discussion of the authority required to control and restrict bascule bridge operations at Third and Fourth and Channel. The simple observation of "working with Coast Guard and boat owners" does not address the legalities of a navigable waterway. Mitigation will be required for boaters. (Philip De Andrade, delegate of Mission Creek Harbor Association)

The DEIR states that "intersection and arterial analyses assume that the Lefty O'Doul (3rd St.) and Peter Maloney (4th St.) bridges would not be lifted for boat traffic during the peak traffic times before and after baseball games" (I.29), and that "traffic mitigation...strategy includes closing...the Lefty O'Doul Bridge to vehicular traffic before and after events." (V.5)...

On III.92, it is stated that "the frequency of bridge openings averages 40 to 75 per month during the winter, increasing in the spring and summer months. The highest observed number of openings was 180 in April 1994; the average number of openings per month was 130." IV.158 states: "During the spring and summer there have been an average of approximately four bridge openings per day." While the statistical average may be correct, it should be noted that most bridge openings are clustered into weekend days and weekday evenings, when at least twelve of the Mission Creek Harbor sailboats regularly (and 5 more occasionally) compete in sailing races on S.F. Bay, and cruising sail, fishing and power

boats can be used by working people. The most active sailboat racing, fishing and power boating season is between April and October, which coincides with baseball season.

IV.158 states "Most requests for openings could likely be shifted to avoid the heaviest traffic periods..." Sailboat races are time sensitive events. Races are primarily held on weekend days and weekday evenings after work (much like baseball games). Crews (normally 2-6 per boat) must be gathered, gear placed aboard, and sails and rigging prepared for a wide variety of weather conditions. Since many evening races have to be completed by sunset, start times (and transit times to arrive at those starts) are scheduled accordingly. Finish times depend on course, currents, wind and hull speed, as do arrival times for reentry into the Channel after races. This leaves 1.) a very narrow time margin available for boats departing the Channel, and 2.) little or no control over return times for tired, wet and cold mariners who have limited auxiliary engine fuel and quite limited ability to coordinate their arrival with baseball game schedules.

While Coast Guard protocol requires bridge openings within one hour of a request for opening (III.92), in practice, boats leaving the Channel can usually do so with 15-30 minutes notice (unless the brigdetenders are working at Islais Creek). When they leave, boaters let the bridgetenders know what time they expect to return, so the bridges can be opened for reentry to the Channel immediately after the boat is sighted and the bridge is cleared of traffic. When sailboats are leaving for races or other scheduled events, as many as possible will leave together. This practice, while prolonging the amount of time the bridge is open by a few minutes, minimizes the number of openings in any one day. With proper planning, this practice can be extended to coordinate returns, as long as alternative temporary docking is available.

An analysis of the Giants 1997 schedule (26 weekend day games, 42 weeknight games, and 13 weekday games), shows that bridge closures would affect boaters on roughly half of the Saturdays and Sundays between April and September, and 42% of Friday evenings and 33% of Monday evenings (when local yacht club sponsored races are scheduled). If bridge openings are not permitted for an hour before and after stadium events, active boaters would have the choice of either not using their boats, particularly for weekday evening events after work, or finding a more accessible berth, unless alternative temporary secure berthing facilities (within walking distance or with land transportation access) are available.

The economic viability of Mission Creek Harbor depends on bridge access for more than 60% of the vessels berthed here. Pleasure and fishing boats (other than houseboats) pay more than half the berth rents collected to fund Mission Creek Harbor Association (MCHA) activities, including the development and maintenance of a public access frontage park, public water and toilets, and a S.L.U.G. member community garden, as well as payment of rent to the Port for the marina.

MCHA is a non-profit, mutual benefit corporation which depends on the volunteer service of all its members (berthholders) to keep the cost of berthing a boat within the means of

moderate income boaters, and to maintain the dedicated public access park and community garden. If small boat owners couldn't berth in Mission Creek because of bridge closures, it would be disastrous for the Harbor, which would lose not only rent income but also critical volunteer participation in public benefit activities. Since small boat (under 30') harbors at moderate cost are almost extinct in San Francisco it would also be a great hardship for the boat owners.

In addition to recreational vessel access, Mission Creek Channel depends on the 3rd and 4th St. bridges for emergency access by fireboats, access by the U.S. Coast Guard for safety and security and by State Fish and Game vessels for protection of the wildlife in the Channel (as was shown after the October, 1996 oil spill). The impact of bridge closures on these uses (while unscheduled, and therefore hard to quantify) was not even considered in the DEIR. Demolition of the 4th Street stub of the 280 freeway and construction of the Mission Bay development project (North and South of the Channel) will probably involve use of barges moved by tugboats, as is planned for construction of the Giants stadium (IV.311). China Basin Landing between 3rd and 4th Street is used by tugs and barges, as well as a passenger cruise boat, and other vessels may be tied up there either permanently or temporarily. (Corinne Woods)

Page IV.156: Who controls bridge openings? It is possible to enforce a procedure to prohibit openings one hour before and one hour after games? (Steven L. Vettel, Residential Properties Group)

IV.156, Bas[c]ule Bridge Operations: It is unclear who has the authority to decide bridge operating rules. If this cannot be controlled during the pre- and post-game time periods then the traffic mitigation plan is meaningless. (Diane Nygaard)

There is no discussion of the authority required to control and restrict bascule bridge operations at Third and Fourth Streets and the Channel. Working with the Coast Guard and houseboat owners does not address the legal requirements associated with closing a navigable waterway. (James Haas)

Article 4, Section 10 (old numbers) of the State Constitution prohibit a municipality, et al., from abandoning access to a navigable waterway without making available nearby access. Reference Case Layne (sp?) vs. Redondo Beach, 49 Cal F 3rd 1975 Case 251 Business and Professions Code 11610.5. Public Access to Navigable Waters is Condition of Subdivision. (Kent T. Woodell, Chairman, Sportsmen for Equal Access)

There is no discussion of the authority required to control and restrict bascule bridge operations at Third and Fourth and Channel. Working with Coast Guard and boat owners does not address the legalities of closing a navigable waterway. (Philip DeAndrade, Mission Creek Harbor Association)

The planned closure for one to two hours before and after stadium events of the Third Street and Fourth Street draw bridges will create a hardship for sailors, fishermen and others who dock their vessels in China Basin channel. While the boaters are willing to work with the Giants, mitigation for this hardship, including docking space outside the bridges, should be included in the project plan. (Randy Craig)

It would not take "up to 15 minutes" to clear pedestrian, transit and shuttle bus traffic after a bridge opening as long as ballpark traffic was rerouted and not permitted to back up at already crowded intersections north of the Channel. (Corrine W. Woods)

Access up the channel through the Third Street bridge must be maintained and the false assumption that the channel could be closed to water traffic should be dropped from the pedestrian traffic plan. (L. Joseph Boss)

Except in emergencies, the projected Ferry Terminal at the mouth of Mission Creek Channel would probably be inappropriate for mooring small boats, although that alternative should be explored, and provision should certainly be made for such emergencies in the Ferry Terminal planning process.

On V.10, there is a recommendation to:

- "Work with the Coast Guard and involve property owners and tenants with boats docked in China Basin Channel to develop a set of procedures that would minimize the Peter Maloney Bridge and Lefty O'Doul Bridge openings for about 45 minutes to an hour before and after a game."

We suggest the following changes:

- To be included in V.4 - Ballpark Transportation Coordinating Committee: Include recreational boat owner representatives of Mission Creek Harbor and bridgetender representatives from D.P.W. on the Ballpark Transportation Coordinating Committee to ensure scheduling coordination of bridge openings (to the extent possible) to minimize delays to pedestrian and transit, shuttle and emergency vehicle access across the Peter Maloney and Lefty O'Doul bridges, and to coordinate bridge openings or routing to temporary berthing facilities when advance notice scheduling is not possible.

- As part of the project plan and at no net additional cost to boaters*, provide alternative temporary secure berthing facilities (with land transportation access or within walking distance) in the China Basin area for vessels requiring access to Mission Creak (China Basin) Channel when bridges cannot be opened in time to provide for the health and safety of mariners or to meet external time deadlines.

* If there is a charge imposed on boaters for use of temporary berthing facilities, this increases their berthing costs, and again reduces the economic viability of Mission Creek

Harbor. There is precedent for providing a reduction in rent to offset the cost of required relocations in Mission Creek Harbor's lease with the Port of San Francisco. Any temporary berthing charges or offsetting rent reduction to boaters should be funded by the Project Sponsor, so that neither the Port or MCHA has to suffer financially from limitations on access to Mission Creek Channel. (Corinne Woods)

Response

The existing Federal Drawbridge Operating Regulation, 33 CFR 117.149 China Basin, Mission Creek, requires the Lefty O'Doul (Third Street) and Peter Maloney (Fourth Street) bridges to "open on signal if at least one hour advance notice is given." The Bridge Section of the United States Coast Guard Eleventh District administers the Drawbridge Operating Regulation, and the San Francisco Department of Public Works, Division of Bridges and Tunnels provides and supervises the bridge tenders. Every effort is made to accommodate mariners' requests expeditiously, but delays of as much as one-half hour before the bridge can be lifted now occur when bridge traffic on 3rd and 4th Street is heavy, as currently is the case just prior to and just after games at 3Com Park on Candlestick Point. The coincidence of recreational activities at South Beach Harbor, China Basin Channel, and the proposed ballpark would increase traffic on 3rd and 4th Streets and could cause more frequent or longer delays, but would not constitute the "closing of a navigable waterway." The Coast Guard and the Department of Public Works are aware of the potential delays, as well as of the safety and security issues created by increased pedestrian and vehicular traffic on the bridges, and have expressed willingness to work with boaters' associations, neighborhood associations, and developers toward a resolution.[15] The Coast Guard and the City are actively pursuing meetings with these groups to address the technical issues raised by their concerns.[16]

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15. Kingsley Roberts, Supervisor, Division of Bridges and Tunnels, San Francisco Department of Public Works, and Wayne Till, Chief, Bridge Division, Eleventh Coast Guard District, telephone conversations, EIP Associates, May 14, 1997.

16. Jerry Olmes, Bridge Division, Eleventh Coast Guard District, and David Prowler, Office of the Mayor, San Francisco, telephone conversations, EIP Associates, May 15, 1997.

Because the Drawbridge Operating Regulation previously mentioned is of federal jurisdiction, any proposal to change it would require separate analysis, on the federal level, of some specific amendment if such amendment were presented by the City to the Eleventh Coast Guard District. Neither agency has the authority to alter the Drawbridge Operating Regulation. However, both agencies believe that other solutions to the situation can be devised within their authority. Cooperative agreements among the concerned groups, amended guidelines for actions by the bridge tenders, increased staffing at the bridges during peak-use periods, and special game-day or race-day lift schedules are among the possibilities already under consideration. Lifting the bridges for emergency access of fire boats or other emergency response equipment is covered in the General Operating Regulation, which takes precedence over the Drawbridge Operating Regulation.

The following information has been to p. III.92 of the EIR under the subheading China Basin Channel Bascule Bridge Operations. The third sentence has been amended to read:

> **Bridge tenders are on-duty 24 hours a day because under Federal Drawbridge Operating Regulation, 33 CFR 117.149 China Basin, Mission Creek, a bridge tender must open both bridges, ~~within an hour of a request for opening~~"on signal if at least one hour advance notice is given."**

The following two sentences have been added after the revised third sentence.

> **The bridge tenders make every effort to respond to boaters' signals expeditiously, but delays of as much as one-half hour before the bridges can be lifted now occur when traffic on Third Street or Fourth Street is heavy. Such delays occur just prior to and just after games at 3Com Park on Candlestick Point.**

The following information has been added to p. V.156 of the EIR under the subheading *Impacts of Bascule Bridge Operations*. The fourth sentence has been amended to read:

> **Under Federal Drawbridge Operating Regulation, 33 CFR 117.149 China Basin, Mission Creek, which requires the bridges to "open on signal if at least one hour advance notice is given," there is the potential that a bridge opening could be requested for the period during the hour before or after a baseball game or other event.**

The following sentences have been added after the last sentence in the paragraph.

> **Delays in lifting the bridge, at least similar to current delays (up to one-half hour), would be expected if alternative arrangements were not made. The City and the Coast Guard are actively pursuing meetings with boaters' associations, neighborhood associations and the developers to resolve the issue of delays through such actions as cooperative agreements, amended guidelines for bridge tenders, and increased staffing at the bridges during peak periods.**

An absolute prohibition of bridge openings for one hour before and after the game would not be necessary to provide appropriate pedestrian and bicycle access to/from the ballpark. What is needed is the ability to control to a degree when bridge openings would occur. Opening the bridge 45 minutes before a game starts would have less impact than opening it 15 minutes before the game. If the bridge opening 15 minutes before a game or event could be deferred for 15 minutes until after the game or event began, it would make a substantial difference in the level of impact.

As is noted on p. IV.158 of the EIR, if ballpark traffic were allowed to use both the Lefty O'Doul and Peter Maloney bridges before and after games, traffic would often queue up across one or both bridges. This would complicate bridge openings, and it would mean that after a bridge opening it could take 10-15 minutes for traffic conditions to return to the "normal" condition that existed before the bridge opened. This is one reason why it is proposed that the Lefty O'Doul (Third Street) bridge be closed to traffic and the Peter Maloney bridge be operated in one direction only before and after the ballgames.

One of the actions that could be taken would be to develop a system where the bridge operators notify the Giants' manager of transportation operations of an impending request to open the bridge and the approximate time of the opening. This would allow Giants staff and Parking Control Officers included in a Transportation Mitigation Program to take the proper steps to allow the bridge opening to occur in the least disruptive fashion. The Giants could also keep the bridge operators informed of game schedules and, as the game is progressing, the approximate ending time. A representative of the Department of Public

Works involved in the operations of the bridges could be a member of the Ballpark Transportation Coordinating Committee.

A number of commentors suggested that provisions for vessels waiting to re-enter the Channel could be made at South Beach Harbor or at the Pier 52 boat ramp area south of the Channel This could be one of the actions explored by the City and the project sponsor in working with the Coast Guard and the users of the Channel.

The traffic routing plan is designed to divert all non-ballpark traffic traveling north on Third Street to Sixteenth Street. As noted in the comments a barrier could be placed across Sixth Street at Sixteenth Street signed "Local Traffic Only" to discourage traffic from attempting to use Sixth and Channel Street to bypass Third Street. This would prevent these vehicles from being "trapped" due to the closure of the Third Street bridge and the one-way operation of Fourth Street southbound before games. The following text containing this suggestion has been added as the last sentence in the last full bullet item on p. V.9:

> **Place a temporary "Local Traffic Only" sign on Sixth Street at the Sixteenth Street intersection to discourage attempts to use Sixth Street as a bypass around the Third Street detour.**

The following has been added as the first bulleted item on p. I.50 of the EIR:

> **Place a temporary "Local Traffic Only" sign on Sixth Street at its intersection with Sixteenth Street to discourage attempts to bypass the Third Street detour;**

Traffic Signal Optimization

Comments

Page V.5: All traffic signals in the vicinity of the ballpark should be on the same computer system located in and operated from a central command post within the ballpark. (Steven L. Vettel, Residential Properties Group)

Traffic control impacts before and after games vary, as the DEIR points out, according to many factors, but fundamental distinctions exist between weekend games, weeknight games,

and weekday games. Traffic control measures have to be responsive to both these basic differences as well as to specific game day conditions. Control of the major arterials and their signalization systems is a key to the success in managing the traffic in the vicinity of the ballpark.

Accordingly, all traffic signals within the vicinity of the ballpark should be on the same computer system and that system should be located and operated at the proposed ballpark. The technology exists and its implementation as a mitigation measure would assure that the most efficient use of the available street capacity is realized. The DEIR speaks to modifying the timing of signals at a variety of intersections; a centralized computer control for all intersections would carry this measure to its maximum productivity and reduce (if not replace to a degree) the reliance upon PCO's. The DEIR is silent on the use of this technology.

Implementation of this kind of a system would simplify and make efficient the changes in traffic controls needed before and after games, as well as variations between weekend, weekday and week evening contests. As with other mitigation measures, experience would allow adjustments for improvements and the system could easily react, be tested, and altered in response to short-term and long-term changes in the surrounding neighborhoods. This method of traffic management is used by many jurisdictions and has been employed successfully at Coors Field in Denver.

Use of this technology would also allow the installation and use of electronic signage, both controlled lane signs (such as are currently employed on reversible lanes at 3Com Park) and informational signage. The DEIR is also silent on the specific use of such electronic signage. (Douglas G. Wright)

Response

The San Francisco Department of Parking and Traffic (DPT) would be expected to develop a special signal timing plan at intersections that are prone to increases in traffic volumes as a result of the ballpark. DPT currently employs a "special event" signal timing plan at intersections near 3Com Park before and after ball games to facilitate traffic flow. Many of the intersection improvement measures recommended in Chapter V of the EIR would involve optimization of traffic signals; an optimized signal system would be best accomplished by conducting actual field surveys upon opening of the ballpark so that the actual travel demand by direction at each intersection could be determined. Traffic signals would then be programmed to maximize efficiency.

The City and County of San Francisco currently employs a pre-determined signal timing plan of which the cycle time is fixed, and it is very efficient in minimizing delay, especially in the downtown area. The main reason such a "pre-timed" signal system works effectively is that traffic flow in the downtown area follows a pattern and usually reaches a point of saturation during the same peak hours on most days during the work week; therefore, signal timing can be pre-determined precisely to accommodate the travel demand. Since the post-event ballpark traffic flow pattern could be forecast quite accurately (because most ballpark vehicles would leave at the end of a game), traffic signals could be pre-set to increase the amount of green time allocated to the approach(es) with additional ballpark traffic. The ballpark traffic flow pattern before a game can also be forecast (since most of the patrons who would park at the dedicated parking lots south of the channel would likely arrive during the hour prior to a game or event), and their arrival paths would largely depend on the pre-game traffic routing plan. Therefore, traffic signals could be pre-set to establish maximum efficiency. The Ballpark Transportation Coordinating Committee would, however, need to review the first few events and make adjustments, as necessary, depending on the results of the initial signal timing settings.

Signal timing optimization could potentially be implemented more effectively with advanced technologies (e.g., Intelligent Transportation Systems). This would also allow different signal plans for different size events. The Transportation Coordinating Committee, which would include DPT staff, would likely explore the opportunities of applying new technologies for ballpark traffic control.

Miscellaneous Comments on Traffic Routing Plans

Comment

Page V.35-38, Table V.B.3 should be recast as an additional table that shows LOS if only Temporary Improvements are made and Permanent Improvements are not done, since there is currently no funding for Permanent Improvements. Such a recast table would be a more accurate and realistic reflection of LOS in the near term. (Rincon Point South Beach CAC)

Response

The levels of service shown in Table V.B.3, pp. V.35 - V.38, would remain unchanged if the "temporary" traffic mitigation measures described in Chapter V were implemented without the "permanent" measures. Most of the temporary measures described in Table V.B.2 would require a special signal timing plan before and after games or events and possibly some Parking Control Officers for intersections. The "temporary" measures were devised specifically for the purpose of mitigating ballpark traffic and would not, themselves be appropriate for non-event days or time periods. In contrast, the "permanent" measures in Table V.B.2 could potentially solve both existing problems as well as improve traffic circulation before and after events at the ballpark.

The following text has been added to page V.33 to clarify this point, after the first sentence in the first paragraph under "Permanent Mitigation Measures, Preliminary Routing Plan:"

> **While most of the recommended mitigation measures for the preliminary traffic routing plan would be temporary, usually before and after games, the permanent improvement measures described in Table V.B.2 could potentially solve some traffic problems permanently, and aid ballpark traffic. These permanent improvement measures would provide two main advantages:**
>
> **1. Some of the temporary improvements would no longer be needed with the permanent improvements. For example, some intersections would not need a special-event signal timing plan if the existing timing plan was adjusted (optimized) permanently. In fact, it is unnecessary to implement a special event timing plan for intersections that are far from the ballpark, as traffic would become more dispersed and more difficult to predict.**
>
> **2. As shown in Table IV.E.25, pp. IV.145-IV.149, some of the study intersections would already operate at unacceptable levels of service, especially during the weekday 3:30 - 4:30 p.m. period, with or without a ballpark. These recommended permanent improvements (e.g. re-striping a particular intersection approach) could solve some of the existing problems and possibly reduce the extent of temporary improvements necessary to mitigate ballpark traffic in the future.**

While the recommended permanent improvements described in Table V.B.2 were devised specifically for intersections, other general permanent measures should also be considered and some are listed below.

Transit Mitigation

Transit Incentive Program

Comments

p. V.43, Transit Incentive Program- Staff would, additionally, recommend participation in the "Commuter Check" program offered by several bay area organizations including Muni. This regional transit voucher program is an RTA/MTC funded project. It is a convenient way for employers to provide a tax-deductible benefit to their employees and would encourage transit use.

Another possible funding measure would be to subsidize transit via a small (25¢) per ticket surcharge. This would allow anyone with a game ticket to use transit to/from the game for "free." This would also eliminate the need to check tickets and would in turn, speed loading times after the game.

In lieu of a per ticket charge, we note that the report fails to identify any fare collection or funding strategies. (Peter Straus, Manager of Service Planning, Muni)

[T]he EIR does not talk about how to encourage public transit. I think there has got to be some way included in every ticket, the price of a CalTrain, BART ticket, Muni ticket, so you just come out of the game, you have got your ticket, you hand the guy the thing, maybe somehow get together with BART so it is encoded on the back of the ticket, some way to really, really encourage people to take public transit. It is the only way it is going to work for our neighborhood. (Peter Bouton)

Giants should have plan to provide public transit with tickets. Park free at Candlestick and shuttle to stadium. (Babette Drefke, Potrero Boosters & Merchants Association)

Encouraging fans to ride transit is documented in the DEIR as critical to the successful management of the transportation systems serving the ballpark, but little in the way of detailed ideas for transit incentives is offered (page V.43). Much more attention needs to be focused on this subject since a higher utilization of transit is a critical mitigation measure.

Perhaps one of the first tasks of a Ballpark Coordinating Committee would be to begin to explore, with the Giants organization and City Department, possible transit incentive ideas. A few of these ideas, which probably lessen the traffic impacts on the South Beach neighborhood, include the following:

- At a minimum, an information brochure on alternative (to the automobile) means of transportation to and from the ballpark must be developed and made available without charge to fans at the time of ticket purchase, and other times as appropriate. At this time, a brochure of this nature - "Get Out Of Traffic" - is available for 3Com Park, and this type of information guide should be replicated. Along the same line, but with an intent on improving the efficiency of traffic flow, maps and pre-sold parking spaces which are distributed with game tickets should be made part of the transportation management program.

- Although a pricing system which integrates transit and parking prices, and which encourages rather than discourages use of transit is probably the best incentive for using transit, the Giants and the City through the Coordinating Committee should spend time and resources to inventory potential transit incentive programs which have been attempted at other ballparks. In addition, citizen ideas should be solicited and considered as part of this process. (Douglas G. Wright)

The DEIR contains no significant plans for improving public transportation and increasing fan ridership on public transportation. This should be one of the main issues discussed in the DEIR, since traffic problems are one of the biggest stumbling blocks to this project, and yet there is a complete lack of concrete ideas with regards to this. (Sarah Ames)

Transit incentives would reduce the project's traffic impacts more effectively than increasing capacity for automobiles--as stated on page V.47 of the DEIR--without a negative impact on cyclists. (Ellen Garvey, Air Pollution Control Officer, Bay Area Air Quality Management District)

What about a transit first policy with incentives and a mechanism to enforce and police? (Michael Karasik, Bayside Village Associates)

Employ a true Transit First Policy that has mitigation measures which are enforceable, preferably with neighborhood representation and City support (Harrison report?). (Michael Karasik, Bayside Village Associates)

Page V.43, Transit incentives: What specific incentives would the Giants provide to encourage transit ridership? We believe at least the following incentives should be required:

1. Giants ticket holders should receive a discount on transit fares (MUNI, BART, Caltrain, AC, Samtrans, GGT and ferries), similar to a valet parking discount, which would be subsidized by the Giants;
2. The bus bridge should be free, as should the MMX and F lines directly serving the ballpark;
3. Dedicated parking should be priced to discourage its use, with a significant amount of the parking toll diverted to subsidize transit;
4. Complete transit service information must be provided when tickets are purchased. (Steven L. Vettel, Residential Properties Group)

Within the Transportation Management Program, force the Giants to include literature about where to park, routes to take, feeder bus availability, light rail, ferry, buses, BART, parking lots offsite with express buses to the stadium, etc. Offer true incentives, so that when a person follows the plan, he gets a free hot dog or soda or a discount ticket to the next game. Establish a "frequent flyer" program, allowing good citizens to accrue points for reducing congestion with rewards of all types, such as discounts on tickets, free merchandise, visits to the locker room, etc. Put out a Request For Proposal to the private sector, the goal being to include a profit motive in enticing people to offer creative ideas for implementation of the Traffic Management Program and to reduce traffic and congestion. (Michael Karasik, Bayside Village Associates)

The San Francisco Area would like to see a traffic plan for the new ball park which would include plans that would mitigate the foreseeable problems of additional congestion on the Area's highways and associated on/off-ramps during the baseball season.

It is suggested as a possible positive solution and incentive to ticket buyers, to offer a [special] mass transit discount ticket to encourage the use of existing and planned public transportation. (Captain R. J. Hall, Commander, Department of California Highway Patrol, Golden Gate Division)

Many fans will not be inclined to take transit if automobile parking is free. The DEIR is fairly silent on the question of the pricing of automobile parking and transit. At one point, the DEIR suggests that the designated ballpark parking south of the Channel might require a parking fee (page V.43), but no comments are evident in regard to the price of the "bus bridge" or the question of transfers between transit providers (e.g. BART to Muni). Comments are provided about the assumption of "honor fares" on the Muni light rail service, as well as the difficulty of their enforcement following the games, but the DEIR did not address itself to pricing in a rigorous manner.

This is a very important matter. Transportation pricing is a critical factor in choices of transportation mode and if, for example, parking is actually free in the designated ballpark lots, then many fans would be inclined to drive rather than take transit. Similarly, if transit pricing is not sensitive to this issue, then the incentive to drive will be high. A good example of this is the BART service to Oakland Athletics ball games, where a family will

outlay more cash for a round trip on BART than they will spend to park in the designated lot next to the Coliseum. If this practice is replicated in San Francisco, i.e. each fan riding BART must then pay an additional fee to transfer to Muni and the price of parking is comparatively low, the incentive for groups or families to use transit is greatly diminished.

There certainly should be a substantial price for parking in the designated lots (as will be the case in privately operated lots in the area). Pricing of transit services to the Giants Ballpark should be defined in a manner which relates to the price of parking in order that the transit pricing encourages rather than discourages its use. This means that the question of transfer pricing between regional transit providers and Muni routes serving the ballpark as well as the "bus bridge" must be addressed. To the degree feasible, transportation pricing for ballpark services must be implemented by the City, transit providers, and the Giants, as an integrated policy. (Douglas G. Wright)

Page IV.185. To supplement the MUNI Metro Extension, a "bus bridge" would be created to provide access between Market Street and the ballpark, replacing the Ballpark Expresses that currently serve 3Com park.

We suggest that this be a fareless bus bridge to encourage transit use. A surcharge of 25-50 cents for every ballpark ticket sold could be dedicated to transit subsidies to pay for ballpark-specific transit, like the bus bridge. (San Francisco Tomorrow Waterfront Committee)

IV.83 - Bus Bridge Loading for the bus bridge in particular, and all exiting MUNI vehicles, will be a huge problem if fares are collected one by one as MUNI now operates. Baltimore pre-sells fares from machines on the platform, and opens all doors to allow quickest possible loading. The slower the loading the fewer runs can be made -- and the more frustrated potential riders become. The issue of a free shuttle must be explored to maximize ridership and minimize loading time. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

The Giants can improve the public perception of the TMF [commenter's suggested Traffic Mitigation Fee, a parking surcharge] by not providing any free parking for anyone. This means that: employees, fans, management, players and politicians should all pay for parking, including the TMF. It will not seem fair to provide free parking to millionaire ball players when everyone pays high parking fees. (Howard Strassner, Chair SF Group, Sierra Club)

Page V.40: It is noted that transit incentives would mitigate regional impacts on freeway network and ramps. Would these incentives improve LOS on local intersections and arterials, particularly those providing access to the South Beach residential neighborhood? (Steven L. Vettel, Residential Properties Group)

Additional Transit Service/Transit Incentive Program (p. V.40 & V.43) - CalTrain would like specifics on transit incentives proposed, since such incentives can affect farebox revenues, marketing expenses and/or administrative costs.

CalTrain staff looks forward to the opportunity to work cooperatively on development of various transit incentives cited in the document, which include additional parking charges, concession discounts and information campaigns and related marketing programs. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

As noted on p. V.43 of the EIR the Giants would develop and implement a *Transit Incentive Program*. This program would include elements to educate ballpark fans about the available transit service, marketing efforts to encourage fans to use transit, and direct incentives to use transit. Examples of incentives would be special fare discount, special treatment for fans using transit to the ballpark (discounts, free gifts), and constrained parking availability coupled with high parking fees. Many transit marketing programs involve contests or competitions to encourage interest and increased use of public transit. The incentive program should include involvement of all the public transit operators as well as the private operators of ferries and charter buses. The transit incentive program would be part of the Transportation Management Plan (TMP) for the ballpark (see response under Transportation Mitigation, *General*) and would be subject to periodic review by the Ballpark Transportation Coordinating Committee (p. V.4).

As discussed on p. V.44 of the EIR, the Giants Travel Demand Management Plan could include subsidized employee transit passes. The *Commuter Check* program suggested in one comment would be one logical way to provide such a subsidy. The EIR discusses purchasing tickets in the ballpark itself between innings to provide an orderly means of ticket purchase (p. V.50) At this time the Giants do not plan to combine game tickets with transit tickets.

Regarding fare collection, it is not advisable to collect fares when passengers leave the Ballpark to use the MMX or Bus Bridge. Fare collection for the MMX is discussed on Page 5-17 of the *Transportation Background Report*. MUNI has more recently indicated that it can be assumed that they will have a proof-of-payment system in place by the time the

ballpark opens.[17] The EIR suggests (p. V.50) that MUNI check fares randomly for passengers deboarding at the Embarcadero Station platform and onboard trains west of The Embarcadero. This would be consistent with the proof-of-payment system, although this would not guarantee fare collection from each rider.

For the Bus Bridge it is suggested that round trip fares be collected for passengers boarding the buses near Market Street before the game. This has been added to the EIR text on p. V.53 at the end of the first full paragraph as follows:

> **To avoid delays collecting fares after a game ends, it is suggested that round trip fares be collected for passengers boarding the buses near Market Street before the game.**

The third sentence of the second paragraph on p. I.50 has been revised as follows:

> **Collecting round-trip fares prior to ballgames and loading more than one bus at a time for the bus bridge trips back to Market Street after games also would help reduce the pedestrian crowds on sidewalks and in a closed King Street and increase the attractiveness of transit as an alternative to driving to the ballpark.**

It is anticipated that other transit services would have normal fare collection. Details of any changes to the current fare collection system would obviously need to be coordinated very closely with the MUNI.

Ballpark transportation planning has been based on the City's *Transit First* policy. The project contains a large number of both transit incentives and auto disincentives to facilitate maximum ridership for transit. The major transit incentive is location of the ballpark within easy walking distance to virtually all transit modes, and provision of the Bus Bridge to the only major mode (BART) that is not within easy walking distance. A further incentive to take transit suggested in the EIR mitigation discussion would be adjustment of schedules and increase in capacity of transit services to accommodate the surge of ballpark patrons before

17. Peter Straus, MUNI Planning, meeting, April 30, 1997.

and after the games (see, e.g., pp. V.40 - V.43 and p. V.54). Transit priority lanes have been suggested (p. V.51) where required to assure reliable transit operation These items are not part of the project, but have been suggested as mitigation measures for the decision-makers to determine whether or not they should be required.

While free or subsidized fares are not contemplated, neither are "premium" fares as are currently charged for trips to 3Com Park. Other non-auto modes such as walking and bike access are very much a part of the overall plan. Many of these proposals will be refined in the future through the Transportation Management Plan, the mitigation program which the Giants and the City would prepare.

Ferry service, if instituted directly to the ballpark, should become very popular and probably would not require incentives for users. Ferry ridership is likely to be constrained more by the capacity to handle large numbers of persons at the ballpark than by demand.

The auto disincentives include limited parking such as the provision of 5,000 spaces for a demand which exceeds 8,000 spaces, the expectation of relatively high parking prices due to the limited supply and high demand, and no freeway capacity increases. While the Giants have not indicated what price would be charged to park in the ballpark parking lots south of the Channel, it is clear that from a transit incentive point this parking should not be free as noted on p. V.43 of the EIR, and should be priced at a relatively high level. Also, to the extent that is feasible, parking fees should apply to all parking, including parking for employees, concessionaires, and all other potential users of the parking on the ballpark site, and in the designated ballpark parking lots. The following text has been added to p. V.43 of the EIR, at the end of the paragraph on transit incentives:

> **The price of parking is an important transit incentive. The Giants should price ballpark parking at a relatively high level, to encourage transit use.**

The fifth bulleted item on p. I.50 of the EIR has been revised as follows:

charging relatively high fees for parking in the dedicated parking lots;

While the cost of riding transit may compare well with that of driving and parking for an individual, driving and parking can be financially attractive for a family or group in lieu of paying individual transit fares,.as noted in the comments. Care must be taken, however, to achieve a proper balance. Extremely high parking prices could result in ballpark fans seeking parking in areas well removed from the ballpark or parking illegally, and taking the risk of a fine. The designated parking area for the ballpark could end up being partially utilized, while all other nearby parking is full. (See responses under Parking, in *Parking Fees and Surcharge*.

Transit information should be disseminated to users through a variety of means (page V.43 of the EIR) including ticket purchase(pages V.43-45). Citizen input for information dissemination and other transit incentives should be sought during preparation of the Transportation Management Plan.

It would be the responsibility of the City, the project sponsor and the Ballpark Transportation Coordinating Committee to work out the details of the transit incentive program with the regional transit operators, including BART, CalTrain, AC Transit, and Golden Gate Transit. The costs of such measures and their impacts on transit fare revenues would have to be taken into consideration in this process.

To the extent that the transit incentives increase the use of transit to the ballpark, they would serve to help mitigate traffic impacts on freeways, freeway ramps and surface streets leading to and from the ballpark. These would include streets providing access to the South Beach area.

CalTrain

Comments

[W]hen CalTrain is extended to Market Street, you could always put an event platform where the current station is. That would save some walking time for the patrons to the game. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Overall, I found the transportation impact analysis to be very thorough and complete. As pointed out in the DEIR, the CalTrain downtown extension would move the Mission Bay station back one block, thus requiring longer walks for ballpark-bound passengers. The DEIR should consider some sort of transit shuttle between the new station and the ballpark. (Doug Kimsey, Metropolitan Transportation Commission)

CalTrain Service (p. V.43) - The CalTrain Joint Powers Board (JPB) has passed resolution 1996-39, supporting the provision of CalTrain service for events at the ballpark. However, the resolution provides support for conceptual service and financing plans in support of the new ballpark. It does not provide for specific operating or subsidy commitments. Still, the JPB will work with the Giants to develop a service and financial program to accommodate Peninsula ballpark patrons within the financial and operational capacities of its member agencies. (James De Hart, CEQA Coordinator, Peninsula Corridor Joint Powers Board)

Response

The EIR primarily addresses the current location of the CalTrain terminal because the downtown extension is still under study and, in any case, would not be in place until well after the ballpark is open. If the station is relocated, access (which could occur via walking, shuttle bus or MUNI MMX's Fourth Street Station) to the new station would be addressed at that time, and would depend in part on the disposition of the vacated property. The relocation would move the station one block further away, which is still well within walking distance of the ballpark.

The text of the EIR on Page V.43 has been modified to insert the following sentence after the first sentence under "CalTrain Service":

> **The JPB would work with the project sponsor and other appropriate parties to develop a service and financial program to accommodate Peninsula ballpark patrons within the financial and operations capacities of its member agencies.**

MUNI

Comments

Page V.50: F Line trolleys should serve the northern waterfront from the ballpark. An F-line boarding area in front of South Beach Park could be constructed if F Line and MMX boarding cannot both occur between Second and Third Street. (Steven L. Vettel, Residential Properties Group)

p. V.50, Muni Metro Extension - Mitigation Measures - Number 3 suggests opening doors on the street side of the vehicles. The alternative of a temporary platform is not adequately described and we do not believe a temporary platform is feasible. Accordingly, an alternative of constructing a permanent platform on the street-side needs to be added to the list of mitigation strategies and evaluated [in] that context, including the impacts of blocking the existing left turn pocket from northbound King onto Second Street. (Peter Straus, Manager of Service Planning, Muni)

[W]e are beginning the final construction phase on the new MMX platforms within a month. It would be most cost effective to build any modification to any platform now with this final phase. (Peter Straus, Manager of Service Planning, Muni)

- The light rail/trolley track connection between the Muni F line and the Muni Extension along the south Embarcadero is now being engineered in order that it be constructed in conjunction with the Mid-Embarcadero roadway project, currently scheduled to be completed in late 1999 or early 2000. This track work will allow continuous rail operations the length of the northern waterfront, thus making the ballpark accessible by rail to waterfront locations north of Folsom Street (to the Fisherman's Wharf vicinity).

  The Muni F line trolley fleet offers the opportunity for an attractive, special ballpark service to evening games, linking parking garages which are realizing reduced occupancy as daytime users depart. Special ballpark park and ride opportunities should be considered, which would allow auto traffic to be intercepted at considerable distance north of the ballpark, from which point fans would be able to use Muni's trolley fleet to access the ballpark.

- A similar approach could be explored with restaurants which lie along the waterfront trolley route. The opportunity for restaurants to provide ballpark "specials" which combine a dinner with a trolley ride to and from the ballpark should be explored. The combination of Muni's attractive trolleys with their high level of access to the ballpark and the "pre-theater" type of restaurant meal would probably prove attractive to some Giants fans. Fans parking near the restaurants would thus reduce the number of autos entering the ballpark area. (Douglas G. Wright)

Page IV.181, MUNI: Cumulative + project will cause 6 MUNI lines to exceed capacity. What are the alternatives for handling this impact? And who will fund them? (Steven L. Vettel, Residential Properties Group)

Page V.50, add item number "6. Provide four car MMX service during pre and post event service periods." This is consistent with comment on page V.40 - Additional Transit Services. (Rincon Point South Beach CAC)

Establish numerous feeder bus stops, such as: all BART stops, Cow Palace, Candlestick Park, Embarcadero office buildings, B of A office building, etc. Keep all game traffic away from the neighborhood. (Michael Karasik, Bayside Village Associates)

While a *Transportation Management Plan* has not been produced, we would like to offer that it be based on the following Planning Principles:...

Satellite MUNI boarding and Ballgame express busses. Use underutilized parking lots as staging points. This could be done in cooperation with major retail centers such as Stonestown, the Masonic / Geary Center, Westlake, among others. (James Haas)

It appears to me that Muni rail lines running just outside the stadium on King Street and "bridge" shuttles using Second and Third Streets will only add to, not relieve, the congestion problems. Perhaps the MMX should load a block away for its run up the Embarcadero while "bridge" shuttles load closer to the Caltrain Station on Townsend for a circuit ending at the Civic Center Metro/Bart station and not at the Montgomery Street Station.

Maybe second level stadium exits could bridge Second and Third Streets (not very aesthetic), moving part of the pedestrian flow away from the critical King Street intersections. (Silva B. Creg)

We support the kind of thinking in V.50, to assist in loading the MMX cars. Similar thinking is necessary to assist efficient loading for Caltrain, bus bridge, charter buses (also mentioned in IV.199) and ferries. (Howard Strassner, Chair SF Group, Sierra Club)

Response

MUNI is studying the feasibility and cost of connecting the F-Line northern and southern waterfront segments. If the F-Line comes to the southern waterfront, all stations (including the Second Street MMX station) would be capable of loading passengers from both right (street) and left (platform) sides.

The MMX loading was discussed in detail because it is expected to have high patronage at a station that was not designed with a ballpark in mind and would require some capital improvements. Closing of King Street after games would facilitate loading of the Bus Bridge. Loading of charter buses and ferries should be manageable with currently planned facilities; details would need to be worked out as the ballpark opening approaches, working with the Ballpark Transportation Coordinating Committee if one is formed.

A field trip and discussion with MUNI on April 30, 1997 was held to resolve the question of capital improvements at the Second/King MUNI Metro Extension stop. It was determined that a temporary platform would not be feasible, as passengers would not safely be able to board MMX cars from the street side without some permanent modifications to the station. It was determined that the following permanent station modifications would need to be made prior to the station's use as a low-platform boarding station:

A. For the eastbound raised median side east of a completed midblock crosswalk:

- Removal of cobblestones and replacement with a flat-boarding surface.
- Extension of the curb about 5-6" toward the tracks to close the gap between the curb and the vehicle.
- Covering of conduits.
- Use of tree grates to replace open pits.
- Relocation of drains due to curb relocation.
- Relocation of "Second Street" sign by DPT.

B. For other locations:

- Extension of the midblock crossing to the westbound lane of King Street; installation of traffic signal at that location.

- Some limited signs to indicate procedures for post-game activity.

- Possibly some moveable barriers with storage for the barriers, depending on fare collection process.

Page V.50 of the EIR has been revised to include these features as part of the mitigation measures. The second sentence in the first full paragraph has been deleted and replaced with the following text:

The following station modifications would need to be made prior to the station's use as a low-platform boarding station:

A. For the eastbound raised median side east of the midblock crosswalk:

- **Removal of cobblestones and replacement with a flat-boarding surface.**
- **Extension of the curb about 5-6" toward the tracks to close the gap between the curb and the vehicle.**
- **Covering of conduits.**
- **Use of tree grates to replace open pits.**
- **Relocation of drains due to curb relocation.**
- **Relocation of "Second Street" sign by DPT.**

B. For other locations:

- **Extension of the midblock crossing to the westbound lane of King Street; installation of traffic signal at that location.**
- **Some limited signs to indicate procedures for post-game activity.**
- **Possibly some moveable barriers with storage for the barriers, depending on fare collection process.**

The concept of using parking garages north of Market Street for evening games for ballpark patrons with subsequent transfer to transit is an important part of the overall Transit First strategy. (See also response under Transportation, Parking, *Satellite Parking*.) If the F Line were to connect to the track south of Market Street, then it would be part of the transit connections. It should be recognized that the F Line employs small, unlinked vehicles and so does not have the potential carrying capacity of the MMX; it would constitute an important but comparatively small addition to the access system. Combining restaurant use with F Line trolleys is an intriguing idea that provides potential economic as well as transportation benefits. It should be explored further as part of the ballpark Transportation Management Plan.

As stated on Page IV.181 of the EIR, additional buses would have to be added to the #30 and #45 routes, and additional light rail vehicles would have to be added to four MUNI Metro lines, to provide adequate capacity for cumulative growth and development in the area in combination with ballpark demand. This would increase MUNI's operating costs. Decisions on funding would have to be made if and when that circumstance occurs; relatively little of the demand would be due to the proposed ballpark because it would not have events on a daily basis, unlike the uses in most projected development in the 2015 cumulative scenario.

Four car MMX service is part of the basic project and is also considered a mitigation measure.

The preliminary transit plan described in Section V.B of the EIR is based on maximizing use of current services including the MMX service and the Bus Bridge. Providing information to fans for a wide variety of new shuttle services could prove difficult. This would be particularly problematic at the Ballpark after games where loading space is limited and fans would have to search for a variety of buses. In addition, more options generally result in less frequency of service. If demand warrants or capacity problems occur on other services, other shuttles could be considered.

For discussion of shuttles to other remote parking areas such as 3Com Park, please see Responses in Variants, under No Dedicated Parking Variant. Note that parking may not be available at 3Com Park (at Candlestick Point) if the proposed shopping mall is built in conjunction with a new football stadium.

Bus Bridge

Comments

With respect to the "Bus Bridge," consideration should be given, and an alternative analyzed, to using 3rd and 4th Streets as a service couplet, with the south side of King Street

as the boarding point. This scheme has certain advantages. The King Street sidewalk is 25 feet wide between 3rd and 4th Streets; pedestrian conflict with MUNI Metro and those using Metro is avoided. The 3rd and 4th Street pair also allows for several downtown boarding/ drop off options, such as going north of Market, Market Street, Mission Street, or using the Moscone pullouts on Howard Street. Going east on Market to 2nd Street is also an option, then looping back to 4th Street. This should be analyzed in any event should a major convention want to use the ballpark and shuttle attendees south from Moscone. Non-MUNI coaches serving hotels, visitors and the convention trade could also use this loop. (James Haas)

"Bus Bridge" should be in on 4th Street, out on 3rd,...not in on 2nd. Public and private vehicles for transportation of patrons of the facility should not be allowed to queue through the residential area waiting to pick-up nor deposit riders. (Michael Kriozere, Urban West Associates of San Diego)

p. V.52, Bus Bridge - What currently exists at the sites proposed for loading and drop-off zones for the bus bridge at Market Street? Will buses queuing pre-game at these locations create problems?

We also note that the cross-walk across King Street, mid-block between 2nd and 3rd streets, and in front of the stadium is not complete. The crosswalk needs to be completed and traffic signals installed to accommodate pedestrian access to/from the ballpark and the bus bridge connection. (Peter Straus, Manager of Service Planning, Muni)

Develop a "bus bridge" from the sixteenth street BART station so that riders will be encouraged to use that station as well (not only the downtown stations).

If people can be expected to walk 15 or 20 minutes from their car (and the D.E.I.R. makes this assumption), certainly they can be expected to ride 15 or 20 minutes in a shuttle bus. However, 15 or 20 minutes in a shuttle bus means that satellite parking areas can be developed farther from the stadium, and thereby alleviate a great part of the anticipated traffic congestion.

Develop dedicated parking on Catellus owned property at 25th and Illinois Streets (the "Western Pacific Site"). Provide a "Diamond Lane" from this lot down Third St. for shuttle buses. (Jeffrey Brown)

2. Second Street is the southbound route for pre-game bus movements (including the "bus bridge") while Third Street serves as the north-bound route for these movements. The DEIR points out that post-game bus movements on Third Street could be facilitated by creation of a bus lane on the east side of Third Street (through the removal of parking). The DEIR also points out that traffic movements at certain intersections on Third Street would deteriorate as a result of this action (page V.51).

The DEIR does not offer an explanation of why Third Street is designated as the post-game route for northbound bus movements, rather than Second Street. Second Street, absent its use as a traffic route, would seem to provide an efficient route (utilizing the center lane) for bus movements, and its connection with the Market Street BART/Muni subway stop is just as direct as Third Street. PCO enforcement of the intersections at Bryant and Harrison would facilitate this use, and as the DEIR points out, traffic flow on Third Street would be enhanced as a result (page V.51).

Use of Second Street for post-game bus bridge movements would require modifications to planned bus circulation routings in the ballpark vicinity as well as at Market Street. At the ballpark, the buses could continue to pick up passengers on King Street and move north on Third. However, the buses could turn east on Brannan to move back to Second, thus avoiding the general traffic routings on Townsend (to The Embarcadero) and Bryant (to the Sterling Street on-ramp). The first two blocks of Third Street north of King could have the right curb lane designated for buses only in order to facilitate the initial movement of the buses.

Upon reaching Market Street, buses could turn right (after deboarding passengers) and move eastward to either First or Beale (depending upon traffic conditions) and circulate back to Second via Howard. This routing would also allow the bus bridge the possibility of connecting with the existing Transbay Terminal (AC Transit) as well as the proposed new terminal location at Beale and Howard. Finally, if Second Street were used as the post-game bus bridge, there would be additional justification for discouraging its use by ballpark automobile traffic and the presence of the buses would add to this effect. Consequently, routing buses other than those providing the bus bridge service, such as charter buses, would realize travel efficiencies and further reinforce bus prioritization on Second. (Douglas G. Wright)

Page V.52, Bus bridge: Using Second Street for the bus bridge both southbound and northbound should be explored. Second Street could be limited to transit, charter buses and local traffic only south of Harrison Street. In this manner, a transit- only lane on Third Street, which decreases the capacity of Third Street for vehicles leaving the dedicated parking, can be avoided. (Steven L. Vettel, Residential Properties Group)

Response

A number of alternatives were considered for the routing of the Bus Bridge, including Third and Fourth Streets. The Second and Third Street routing was preferred because it is the simplest and the most convenient for riders as it would stop directly in front of the ballpark. The Third and Fourth Street option would require the stop to be one block away from the ballpark, and would not have as direct a connection to BART at Market Street. An alternative to the Second and Third Street routing that should be given further consideration

is the idea as noted in the comments of using Second Street for both directions of the Bus Bridge after games. During post-game conditions Second Street should have better traffic conditions than Third Street because the traffic routing plan would tend to send more traffic to Third Street. The following text has been added after the third paragraph, p. IV.186:

> **An additional alternative would be for the Bus Bridge to use Second Street in both directions, looping between Third and Second Street at either end. This would avoid heavy traffic flows on Third Street after a game, although Second Street would also have substantial traffic attempting to access the I-80 freeway ramps.**

The Bus Bridge is planned to have stops only at Market Street and at the ballpark(King Street) in order to provide quick service to/from BART and other downtown regional transit. There would be no queuing of buses or stopping for passengers in residential areas.

Figures IV.E.8 and IV.E.9 (pp. IV.187 - IV.188) show how the loading and drop-off zones for the Bus Bridge would operate under the plan described in the EIR. On Market Street buses would only drop-off patrons in the existing bus stop. No queuing or waiting is proposed on Market Street. The buses would load on Second Street where there is room for buses to queue. Other options may be developed during preparation of the final Transportation Management Plan; it is unlikely, however, that buses would load on Market Street because they would block the bus stops used by regular MUNI Market Street transit services.

The curb areas on King Street where the Bus Bridge would load and unload at the ballpark are currently used for truck loading. The sidewalk areas available are also limited. Buses might have to load or unload in King Street away from the curb, conflicting with traffic and exposing the bus riders to potential safety hazards. The mitigation program in section V.B of the EIR proposes that this block of King Street would be closed before and after games so that in-street loading/unloading would be practical.

The north portion of the mid-block crosswalk does need to be completed. This is part of the improvements needed at the King/Second Street MMX Station as noted under the responses to the MUNI comments, immediately above.

A bus bridge or shuttle to the 16th Street BART Station could be considered as a potential transportation improvement. However, as considerable transit resources are required to run such a service, the success of the Bus Bridge between Market and King should be monitored before considering an additional service. The Third Street Light Rail line would provide an opportunity for satellite or remote ballpark parking south along the Third Street corridor. Sites such as the one at 24th and Illinois Streets that was noted could be used for this purpose. See also the discussion in Variants, Increased Dedicated Parking Variant, for further information on this and other possible remote parking locations.

Ferry Services

Comments

In principal, District staff is supportive of opportunities to consider new markets for Golden Gate Ferry service. District staff requests, however, that DEIR identify what is intended by "ballpark ferry system". Specifically, the DEIR should identify operating and maintenance costs, funding sources, and jurisdictions responsible for [the] implementation of "preliminary plan for ferry service from each of the existing ferry terminals located around San Francisco Bay" (see page V.41)

District staff believes that ferry service from Sausalito to the ballpark may be problematic given the already high utilization of available parking in Sausalito, particularly during summer months (see page V.41).

District requests that projected origin locations of North Bay ferry patrons in Table V.B.4 (page V.42) be clearly identified. Does "Marin" signify Sausalito, Tiburon, or Larkspur? How is "Other (North Bay)" defined? A projected increase between 136 and 202 patrons is a substantial increase in patronage for one route. (Jerome M. Kuykendall, Director of Planning and Policy Analysis, Golden Gate Transit)

Page V.42, Ferry service: Only 500 fans utilizing ferries seems very conservative. What incentives can be developed to increase the number of fans using ferries? (Steven L. Vettel, Residential Properties Group)

Response

The EIR outlines the framework of a ferry service to the ballpark both in the transportation mitigation program (pp. V.41 - V.42) and in Chapter VII as a Variant to the project (pp. VII.1 - VII.9) Questions of jurisdictional responsibilities and funding should be the subject of more detailed discussions and negotiations with the various current (and possibly, future) ferry operators. Because of uncertainties about the provision of ferry service, care was taken not to overstate or over emphasize the significant of ferries in terms of total transit ridership. This approach provides the most conservative (that is, worse) traffic impacts; if ferry service were provided and served more than 500 fans, traffic and air quality effects would be reduced.

Weekend parking is, indeed, a concern at Sausalito and the EIR (p. V.41) suggests Larkspur as the location for weekend ferry service rather than Sausalito or Tiburon. Conversely, Larkspur might be difficult to use for weekday games. Thus it is probable that a different Marin County location would be used for different games days (Sausalito on weekdays and Larkspur on weekends).

The data used to determine the geographic origin of ballpark patrons did not differentiate among locations within Marin County. It is reasonable to assume that the fan base would be similar to the overall Marin population distribution. "Other North Bay" is primarily Sonoma County. To clarify the role of ferry services in the Ballpark Transportation Program, the EIR text has been modified to insert the following text which replaces the first four sentences on p. V.41:

> **During the season appropriate ferry service could be provided for all ballgames by up to five boats and landing opportunities adjacent to the ballpark (potentially at a double-berthed ferry landing float), provided that such service is consistent with the regional ferry service plans and studies described below, does not interfere with pedestrian circulation or South Beach Harbor operations, provides for the maximum feasible public access for both ballpark and non-ballpark uses,**

ensures public safety, and that the location proves consistent with the maximum opportunities for year-round use.

The Giants would participate in the public-private partnership of major Bay Area governmental agencies and ferry service providers, including BCDC, MTC, the Bay Area Council, BADCAT/BAEF, GGNRA, the US Park Service, Caltrans, the Golden Gate Bridge District, AC Transit, the Port of Oakland, and the Blue and Gold Fleet and other public and private ferry operators, which is currently proposing to undertake a study of the feasibility of an expanded Regional Ferry Transportation System. At the conclusion of the study, the Giants would make good faith efforts to assist in implementing feasible study recommendations relating to ballpark ferry service. At that time, the Giants would also undertake measures to enhance the attractiveness of ferry service as a mode of transportation for ballpark events.

The remainder of the first paragraph on p. V.41 has become a third paragraph on this page.

Regional Transit Services

Comments

In addition to the extra transit services mentioned in the DEIR there will probably be some additional late buses for AC, SAMTRANS and others. (Howard Strassner, Chair SF Group, Sierra Club)

Page IV.83, Golden Gate Transit, AC Transit: What efforts have been undertaken to extend Golden Gate Transit and AC Transit service to the ballpark? Or to provide a direct free shuttle service between the Transbay Terminal and the ballpark?

Page IV.83, Ferry service: If ferry service is based at the Ferry Building, what efforts have been made to provide a free shuttle between the Ferry Building and the ballpark, or an F-line connection between the ballpark and the Ferry Building? (Steven L. Vettel, Residential Properties Group)

Response

AC Transit, SamTrans, and Golden Gate Transit all run some San Francisco buses until midnight. If demand warrants they would be expected to adjust schedules or add runs after ball games. Currently, neither AC Transit nor Golden Gate Transit plan to extend their service to the ballpark.

Transit from the Ferry Building to the ballpark would be via the MMX or the F-Line if it is through-routed south. Some of the Ferry services currently offer free tickets to MUNI and it would be logical to extend that policy to ballpark patrons as well.

Transit Lanes

Comments

We would recommend as a mitigation measure for this project and the projected cumulative development in this area that the Transit-only traffic lanes proposed on Page V.51 be adopted not just on game days, but as a permanent institution. (San Francisco Tomorrow Waterfront Committee)

V.51, Transit Priority: Making transit a priority is best accomplished by establishing a dedicated transit lane all of the time on 3rd Street. (Diane Nygaard)

Response

The ballpark EIR covers only impacts of ballgames and other events at the ballpark, and did not review year-round traffic conditions. It might be feasible to make the transit lane permanent; it would certainly simplify enforcement. Such a change would require more extensive analysis and concurrence of DPT and other City transportation officials. The actual experience of operating the lane on game days would help officials decide whether to extend the practice to every weekday of the year. Also as cumulative growth occurs, the need for a year-round transit lane may be better defined.

Charter Buses

Comments

Page IV.199, Charter buses: To make charter buses more attractive alternatives, a priority lane for charter buses, MUNI and area residents is needed both toward and away from the ballpark. We propose Second Street southbound and northbound. (Steven L. Vettel, Residential Properties Group)

Page V.11: A priority access/egress route for charter buses must be found. Perhaps Second Street south of Harrison should be limited to charter buses, transit, and local traffic.

Charter buses should be prohibited from parking in residential areas, including Seawall Lot 330. (Steven L. Vettel, Residential Properties Group)

Seawall lot 330 shall not be used for tour or charter bus parking. (Michael Karasik, Bayside Village Associates)

Response

It is expected that most of the charter bus services to the ballpark would be for long distance travel from the South Bay, East Bay, and North Bay and points beyond. As a result, their travel route to the ballpark would use the regional freeway network and the streets that link the parking area south of the Channel to the freeway. Second Street is not particularly well located to serve this function.

A transit priority lane was evaluated on Second Street (see Chapter 4 of the *Transportation Background Report*). It was found, however, that Third and Fourth Streets would carry more transit vehicles than Second Street, and that removing a lane from general traffic on Second Street would not be advisable.

Charter buses would park in one of the designated Giants parking lots south of the Channel which are well away from residential areas. There is no plan to park charter buses north of the Channel at any location including Seawall Lot 330 (opposite Piers 30-32).

Disabled Access

Comment

The mitigation measures should also include identification of ADA facility improvements to ensure a smooth transition between transit systems, parking lots and the ballpark. (Doug Kimsey, Metropolitan Transportation Commission)

Response

All facilities constructed as part of the Giants ballpark or as mitigation would have to satisfy the requirements of the Americans with Disabilities Act (ADA). Even temporary facilities

such as transit loading provisions, parking, pedestrian walkways, etc. must satisfy the requirements.

Freeway Ramps

Comments

Page V.47, Freeway ramps: It is inaccurate to state that any and all freeway ramp improvements are infeasible because of San Francisco General Plan policies. The City and Caltrans are currently considering several freeway ramp improvements, including the Terminal Separator study and the Central Freeway study. Additional ramps may be discouraged, but the General Plan does not prohibit them outright when it can be shown that they are necessary and desirable. (Steven L. Vettel, Residential Properties Group)

Table V.B.1 identify adverse impacts to traffic operation on Route-101 and Route-280 on/off ramps for which no specific mitigation improvements are proposed. Please explain? One possible mitigation measure, that would require further analysis is ramp metering. (Harry Y. Yahata, Department of Transportation, Caltrans)

Response

It is correct that the City's General Plan policies do not preclude all freeway ramp improvements but discourages freeway and ramp capacity increases, as explained on p. V.47. However, it is important to note that other projects such as the Terminal Separator and the Central Freeway are considering replacement for ramps that were removed, and as such are not increasing freeway ramp capacity.

Ramp metering could improve the flow of traffic on-line the freeways, but would likely result in further queuing and delay on City streets. The extent of the existing queuing problem is such that ramp metering would appear to be impractical.

Federal and State Funding

Comment

p. VI.1-VI.3 Please identify if the city and county of San Francisco will lose state and federal transportation funding based on the significant unavoidable adverse effects if this project were to go forward without the proper mitigation. (Jeffrey Leibovitz)

Response

No known federal transportation funding would be affected by impacts of the proposed project as disclosed in the Impacts Analysis in Chapters IV and VI of the EIR.

Loading

Comments

Page IV.224, Loading: A plan for large truck loading for the Pavilion Building must be developed before the project is approved to avoid trucks double parking on Third and/or King Streets. (Steven L. Vettel, Residential Properties Group)

IV.225# The access to the ballpark service area is from the driveway under the park expansion. This again is misdescribed and shows why the full impacts of the realignment and build out of the park expansion should be included in this EIR.

IV.226 - Table IV.E.40 Are the proposed uses in the South Beach park expansion factored into this table and related analyses? (Sue C. Hestor, Advocates for South Beach Harbor)

Page I.37 last paragraph. However, the Pavilion Building would not have space for large trucks; therefore, goods would need to be moved a long distance to and from the ballpark loading area on the east side of the site.

Appropriate mitigations for this situation could include restricting the size of the trucks used for deliveries at the Pavilion Building, routing most deliveries to an off-site warehouse, and scheduling night and early morning deliveries. (San Francisco Tomorrow Waterfront Committee)

IV.224 - Freight loading and deliveries
It is impossible to understand this section since there is no graphic explaining the ground level spaces, including loading docks, driveways, etc. for the ballpark. Please provide. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

As noted on p. IV.227 of the EIR, no significant environmental effects would result from truck loading activities as planned for the ballpark. Therefore, formal mitigation measures were not called for under CEQA. However, the EIR recommends measures to improve truck loading and circulation (see p. IV.228). Additional improvement measures have been included in the EIR on p. IV.228, immediately above "Construction Impacts:"

> **As no large truck loading facilities would be planned at the building, a plan should be developed for large truck loading and deliveries at the Pavilion Building. The Plan could include some or all of the following elements as is feasible:**

- **All Pavilion Building large truck deliveries should be made at the east side loading docks. Off-loaded materials could then be transported to the west side service area in smaller trucks.**

- **Allow large trucks to deliver at the Pavilion Building's west side service area only between the hours of 7:00 p.m. and 7:00 a.m. weekdays when no game is scheduled and on non-game weekends.**

Section II.D (Project Characteristics) of the EIR provides text which describes the parking and loading dock areas. Section IV.E, pp. IV.224 - IV.225 further describes the on-site parking and freight loading facilities. Access to and from the west side service and parking area is described in Section IV.B. Land Use, p. IV.24. Table IV.E.40 on p. IV.226 considers only the freight delivery demand of the ballpark project including the Pavilion Building and ancillary uses. The South Beach Park expansion, if it occurs, would be adjacent to the ballpark site and is considered in the cumulative context of the proposed project analysis. Figure 1-3 following p.1-6 in the *Background Transportation Report* shows a schematic layout of the ballpark site which includes vehicular access/egress points, parking areas, and loading areas. Figure II.D.2 in the EIR provides similar information. Detailed drawings showing the dimensions of the parking and loading areas have not yet been prepared, as that detail is not necessary for analysis in the EIR; this detailed design information is generally provided later when building permits are under review.

NOISE

Concert Noise

Concert Noise Assumptions

Comments

With respect to small venue concerts, the Ballpark should investigate whether and where noise-reducing canopies might effectively reduce residential noise levels. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

Page IV.259, Fabric canopy events: The analysis in the DEIR indicates a significant amount of music escaping the canopy. Even if its dBA measures are below ambient, that music will be noticeable and annoying to residents because of its percussive and tonal qualities. (See Wilson Ihrig Report, Appendix S-1, at page 33).

What was assumed as to the noise attenuating capabilities of the fabric canopy? Can a canopy be engineered that prevents any music noise beyond the rim of the ballpark? (Steven L. Vettel, Residential Properties Group)

Response

The comments concern whether or not noise reduction due to a canopy was included. The noise reduction would depend on fabric weight per sq. ft., porosity (tightness of weave or the amount of space between fibers in a fabric), and geometry. Assuming complete closure, a canopy should reduce high frequency noise substantially. Low frequency noise (e.g. bass and percussion) may be little affected, though this may be masked by low frequency community noise. The noise reduction of a canopy was not included in the analysis to obtain a conservative noise estimate.

A hard shell enclosure may provide as much as 5 to 10 dB reduction, depending upon the weight of the material and the degree of enclosure. However, such a design might not be effective at providing substantial reduction of the low frequency noise, because the sources would not be completely enclosed and because low frequency noise bends around barriers more easily than high frequency noise. As noted in General Concert Noise below, however,

low frequency noise may be somewhat masked by low frequency community noise. Complete enclosure of the production music sources and audience would substantially reduce noise transmitted to the community. As explained in the EIR, the small concert events would not contribute to substantial increases in ambient noise levels (pp. IV.259 - IV.261).

Comment

In my opinion, there may be an excess of information and details for the layperson. It might help if, for example, WIA provided summary tables of only the locations where noise impacts are significant and mitigation is required. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

Response

It is true that noise analyses are generally quite technical and can be difficult for the lay reader to understand, although EIR preparers attempt to "translate" the information. Although it might provide a "simpler" analysis if only the areas where noise impacts were deemed "significant" under the CEQA definition were presented, this approach would severely limit the information provided to the reader. Locations where noise might not be labeled "significant" but where noise would increase due to the proposed project then would not be discussed in the document, despite interest on the part of readers who might live or work at that location. Therefore, the EIR presents the results of all relevant sites analyzed, whether or not the results show a significant environmental effect.

Impacts

General Concert Noise

Comment

Impacts upon Environmental Quality, notably noise and light are significant.

EIR Section IV.258 indicates that potential noise impacts upon Site L as a consequence of special events would constitute violation of SF City Ordinance found in Article 29 of the SF Police Code. The potential violation is represented as exceeding the threshold of violation (5 dBA above ambient noise level) by as much as nearly three times (14 dBA). Clearly this impact is not simply unacceptable it is unlawful. Appendix material A.139 related to

regulatory context indicates that the ballpark is not specifically subject to Sate and Federal policies, yet the EIR does not address this potentially unlawful conflict with SF City Ordinance. (Michael Kriozere, Urban West Associates of San Diego)

Response

The SF Police Code regulates noise above certain levels. The SF Police Code does not prohibit noise which reaches certain levels within the stadium. Rather, the Police Code provides that noise levels may not adversely affect other properties or uses, and prohibits "unnecessary, excessive or offensive" noise which is made "without justification." Police Code Section 2901.11 defines "unnecessary excessive or offensive" noise as any sound which exceeds the ambient noise level by 5 dBA or more. In addition, Police Code Section 2915 sets forth criteria which must be considered in determining whether a violation of the Police Code exists. It is thus not possible to state that any increase in noise levels over 5 dBA is always unlawful. In addition, the Project sponsor will be required to procure a loudspeaker permit pursuant to Police Code Section 43 for the use of any sound amplifying equipment. Police Code Sections 47.2 and 49 also set forth regulations for the use of any sound amplifying equipment.

Noise levels are measured at the property line of the property affected in order to determine whether the noise levels exceed certain standards. For example, Table IV.F.4, p. IV.258, shows that the concert noise hourly L_{eq} increases by 7 dBA at Location F, outside the upper levels of the proposed apartment building. Table IV.F.4 also shows a maximum noise level increase of 14 dBA at that same location. The maximum level does not show what an ongoing level of noise will be; the maximum level may be a single occurrence or may occur intermittently. The hourly L_{eq} provides a better gauge of ongoing, or continuing, levels of noise.

The EIR suggests a mitigation measure limiting the large concerts to occurrences of no more than five times a year. A further measure has been added to the EIR to limit noise level increases to 3 dBA or less at receptor location for additional concerts.

Comment

[I]n the EIR it says that rock concerts are just under the decibel usage of a jet taking off. It is just, you know, we wanted to build a stadium -- I guess the public did -- but it didn't take into account all these extra uses. (Nancy Anding)

Response

Noise impacts are described on pp. IV.237 - IV.263 of the EIR. No noise levels at sensitive receptor locations would be the equivalent of jet aircraft takeoff. As shown in EIR Appendix D, Table X.D.1, jet takeoff noise levels are at about 120 dBA. Rock music could reach 110 dBA within the concert area, where patrons choose to attend, but would be substantially less noisy outside the ballpark.

Comments

Rock concerts usually include loud rhythmic components from drums and some bass guitars. These low frequency components propagate relatively easily over long distances and frequently result in complaints to authorities. Complaints in Palo Alto about concerts in Mountain View's Shoreline Amphitheater are a case in point.

In my opinion, use of only A-weighted sound levels is inadequate for estimation and evaluation of probable community response from rock concerts. One alternative evaluation technique is described in ISO (International Organization for Standardization) Recommendation No. R1966, 1st edition, May 1971, which "corrects" the measured or estimated noise levels if the sounds include audible tones (such as music) and/or impulsive (percussive) components. This corrected sound level, in units of L_{eq}, is compared with the measured or estimated L_{95} to estimate the probable community response.

Table 2 permits comparison of the "corrected" L_{eq}'s estimated with rock concerts with the measured or estimated L_{90} sound levels at Locations #3 and #6. ISO R1966 defines ambient as the L_{95}, that is, the sound level exceeded 95 percent of the time, which is the "Noise Criterion." However, for present purposes the measured L_{90} will suffice with the understanding that it (the L_{90}) is expected to be 2 to 3 dBA higher than the L_{95}. In Table 2, it may be seen that at the South Beach Marina (Location #3) the corrected music L_{eq} is 13 dBA higher than the L_{90} and at Location #6 the L_{eq} with music ranges between 11 and 17 dBA higher than the L_{90} depending upon the apartment floor of interest.

The implications of these differences between music and ambient are illustrated in Table 3 which is excerpted from ISO R1966. It shows that with music at the projected levels near Giants Park, the community response is expected to range between "widespread complaints,"

Table 2 [from Lukas Comment Letter]
A Comparison of Ambient Noise Levels and Rock Music
at Locations #3 and #6, as Defined in ISO R1966

Location		Music L_R (L_{eq})	Ambient L_{90}
#3, South Beach Marina and Steamboat Point Apartments		67 dBA*	54 dBA**
#6, north of King, east of Second Street - apartment under construction	Top Floor:	70	53
		69	56
	Bottom Floor:	69	58

* From Table 8.2, Large Venue Productions, with a +5 dB correction because the noise contains both audible tones and is expected to be percussive or impulsive.

** At Location #3, the L_{90} is 7 to 8 dBA less than the Leq. (See Figures 3.4 and 3.5.) This difference is used to estimate the L_{90} at Location #6.

at a minimum, to "threats of community action." In addition, the Park will be well illuminated during concerts. Illumination is expected to exacerbate community response because a visible noise source usually is perceived as being "louder" than the measured noise levels suggest.

On page V.61 of the DEIR, a limit of 95 dBA or a reduction of 9 dBA of the maximum level (104 dBA) for rock music at the Ballpark Rim is proposed after the first five concerts each year. In contrast, on page 53 of the Acoustical Analysis (Appendix S-1), WIA discusses prohibition or a limit of 90 dBA — a reduction of 14 dBA for these large venue concerts. With a 9 dBA reduction, the music level at Location #3 would be reduced from 67 to 58 dBA, and Table 3 suggests that there would be a change from "sporadic complaints" to "no observed reaction." However, at the top floor of Location #6, the music level would be reduced from 70 dBA to 61 dBA, which results in a difference of 8 dBA between music and ambient. Table 3 suggests a change from "threats of community action" to "widespread complaints."

These estimates of community response do not account for the effects associated with the Ballpark (or most other noise sources) being well-lit or visible during the rock concerts which, according to some authorities, may increase annoyance to be roughly equivalent to a 3 to 5 dBA increase in noise level. The estimates also do not take into account that the "Noise Criterion" used herein is the L_{90} rather than the L_{95}, as specified in ISO R1966.

Table 3 [from Lukas comment letter]
Expected Community Response to Rock Music
at Levels 10 to 15 dB Higher than Ambient
(From ISO R1966, Page 7)

Amount in dB(A) by which the rating sound level L_R exceeds the noise criterion	Estimated Community Response	
	Category	Description
0	None	No observed reaction
5	Little	Sporadic complaints
10	Medium	Widespread complaints
15	Strong	Threats of community action
20	Very strong	Vigorous community action

Table 4 shows the community responses estimated with the three limits of Ballpark Rim noise discussed in the EIR or the Acoustical Analysis, assuming that a number of factors in addition to noise are expected to influence the severity of those responses. Considering the combination of factors influencing responses to noise, the estimated responses shown in Table 4 clearly suggest that "no noise limit" rock concerts are expected to result in much community protest and action. It is also apparent that the maximum limit of 90 dBA, as recommended by WIA (the project's noise consultant), is the most environmentally acceptable mitigation measure. It is recommended that all concerts, regardless of venue size, be limited to a maximum of 90 dBA at the Ballpark Rim. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

Page IV.257, Concert noise: It is completely inaccurate to use dBA (an average frequency measurement) to describe rock concert noise. The tonal and percussive qualities of rock music are distinctly perceptible, even if the dBA is not far above ambient traffic noise. See the attached comments of Consultants in Engineering Acoustics for an alternative, more accurate, means of describing rock concert noise. Rock concert noise would far exceed San Francisco Noise Ordinance standards and must be considered a significant environmental impact. (Steven L. Vettel, Residential Properties Group)

Table 4 [from Lukas comment letter]
Differences Between Music L_R (L_{eq}) and Ambient (L_{95})
and Estimated Community Responses with Various Limits
for Rock Music Noise Level at the Ballpark Rim

		Noise Limit at Rim		
Location		No Limit or 104 dBA	95 dBA	90 dBA
#3, South Beach Marina and Steamboat Point Apartments		16 dBA*	7 dBA	2 dBA
#6, north of King, east of Second St. -- apt. under construction	Top Floor:	20	11	6
	Middle Floor:	16	7	2
	Bottom Floor:	14	5	0
Estimated Community Response		Legal threats & vigorous community actions	Wide-spread, vigorous complaints	Some complaints

* $L_R - L_{95} =$ __ dBA, where $L_{95} = L_{90} - 3$ dB

** These estimated responses are based on Table 3 but also include judgements of increased annoyance with noise because the Ballpark and parking lots will be well-illuminated and the events occur on weekend nights. The "noise criterion" L_R is L_{95}, based on a difference of approximately 3 dBA between the L_{90} and the L_{95}, based on "Heavy Traffic." (See Dwight E. Bishop, "Noise Surveys; Community Noise" in C.M. Harris, Ed., *Handbook of Noise Control,* 2nd Ed., New York: McGraw-Hill Book Co., 1979, Fig. 35.12, pg. 35-12.)

Response

Consultants in Engineering Acoustics, one of the commentors, indicates that the A-weighted sound level is inadequate for characterizing music noise from large rock concerts. Rather, the commentor suggests using ISO Recommendation No. R1966, 1st Edition, May 1971, to provide a way of relating community reaction to rock concert noise in the presence of other community noise sources.[18] Basically, ISO R1966 recommends the following procedure:

18. International Organization for Standardization (ISO), *ISO Recommendation R1966, Assessment of Noise with Respect to Community Response*, 1st Ed., May 1971.

1) Measure the A-weighted sound level of the particular noise. If the sound level varies appreciably over time, the measurement should be the L_{eq} (which would be the case for music)

2) If the sound contains tonal or impulsive components (as is the case with music), add an adjustment of 5 decibels to the measured sound level.

3) Determine the background sound level in the absence of the subject noise. The background sound level is defined as the level of noise exceeded 95% of the time.

4) Compare the adjusted noise level (in this case, the music L_{eq} plus the 5 decibel penalty) with the measured background sound level, and use the difference between the measured noise level to determine the degree of annoyance.

The levels of community reaction are shown in the comment, in "Table 3."

The commentor then indicates that the difference between the calculated music noise as "corrected" by the commentor and the noise criterion level, or background levels, used in the ISO R1966 method is such that the community reaction would range from "widespread complaints" to "threats of community reaction." The commentor further introduces a penalty for stadium lights which, the commentor asserts, would make the music noise more apparent.

A similar approach has been taken for regulating concert venues in the United Kingdom, where the A-weighted L_{eq}, or Music Noise Level (MNL), occurring between 9:00 a.m. and 11:00 p.m., is limited to no more than 15 decibels over the background level over any 15-minute period for all venues numbering 4 to 12 calendar days per year.[19] The background

19. Griffiths, Jim, (1995) "The Current Environmental Audience and Occupational Guidelines for Concerts in the United Kingdom," *Proceedings of InterNoise 95*, Newport Beach, California, July 10-12 1995., Institute of Noise Control Engineering, Table 1., p. 805.

noise level is defined as the A-weighted noise level exceeded 90% of the time (L_{90}) during the last four hours of the event, or during the entire event if lasting less than 4 hours. No penalty is applied for the character of the noise, and the background used for comparison includes the concert noise, unlike other methods for analyzing concert noise; thus this method controls the maximum noise levels produced rather than an overall average noise level. The U.K. regulation advises that the Music Noise Level be limited to 5 decibels over the specially-defined background for venues with events lasting up to 30 days per year, though the source of the information is vague on this point. No upward adjustment is added to the music noise level in the analysis approach.

The comment indicates that the reason for applying one 5 decibel penalty is to account for tonal and rhythmic components from drums and some bass guitars. While rock concert noise contains these components, the audibility of these components in the presence of existing community noise is not clear. Most persons' concerns with low frequency sounds are from experience in buildings with inadequate sound insulation between dwellings, where high frequency tones produced in one apartment are very much attenuated by the intervening wall and floor/ceiling assemblies, but low frequency sounds such as those from a personal stereo travel through the walls and floors to adjoining apartments. The result is a booming noise that is audible in other units, especially because of low background sound levels found inside most residential buildings.

In contrast, low frequency noise (approximately 50 - 500 Hz) from a rock concert in an open air stadium in an urban environment such as San Francisco may be masked partially or completely by low frequency community noise which pervades the area of the proposed project. For example, the projected 1/3 octave band spectra[20] for Townsend and Kelly

20. 1/3 Octave Band: One octave is an interval between two sound frequencies that have a ratio of two. For example the frequency range of 200 Hz to 400 Hz is one octave, as is the frequency range of 2000 Hz to 4000 Hz. A simple example of an octave is the octaves on a piano; the sound distance between "middle-C" and the next lower or higher C key. An octave band is a frequency range that is one octave wide. A standard series of octaves is used in acoustics, and they are specified by their center frequencies. In acoustics, to increase resolution, the frequency content of a sound or vibration is often analyzed in terms of 1/3 octave bands, where each octave is divided into three 1/3 octave bands.

streets (Location C) associated with large venue productions, suggests that maximum low frequency rock music noise would approximate the existing ambient 1/3 octave band spectrum. The projected energy averaged levels of low frequency rock music noise are roughly 7 or 8 decibels less than the existing energy averaged ($L_{eq(1/3)}$) 1/3 octave band levels of community noise (see Figure 8.6 in *Acoustical Analysis of Impact from Stadium Noise*, p. 42, by Wilson, Ihrig & Associates, March 1997, a background study for the EIR). Under these existing ambient community noise conditions, low frequency components of rock music could be largely unnoticed.

The commentor indicates that low frequency noise from Shoreline Amphitheater is a case in point. However, the projected levels of rock concert noise at the China Basin ballpark are substantially reduced by the ballpark rim, which acts as a barrier to noise, unlike the more open configuration at Shoreline (see Response below, for further comparison of noise at Shoreline with potential noise from the ballpark). Without the current ballpark orientation, or if the ballpark were oriented 180 degrees to the present proposed orientation, the projected levels of low frequency noise at receivers located north and northwest of the structure would be higher and, thus, more audible. On the other hand, the projected levels of rock music at Townsend and Kelly at higher frequencies between 1,000 and 5,000 Hz (more typical of singing and lead and rhythm guitars), the most sensitive portion of the A-weighting curve, protrude well above the projected ambient 1/3 octave band energy averaged noise spectrum (see Figure 8.6, referenced above), and would be very perceptible without some sort of noise reduction measure. A strict application of ISO R1966 could include an upward adjustment of predicted music levels to account for these high frequency tonal components rather than the low frequency noise as suggested in the comment.

A 5 decibel penalty for impulsive and tonal nature was not included in the noise analysis methodology for the EIR. For quantitative analysis of cumulative changes to community noise environment, the penalty is not appropriate. Not all people would react to concert music in the same way; some people are more averse to concert noise than others and some might enjoy an occasional concert in their neighborhood. Concert music is materially different in nature from

other types of noise containing tonal components, such as fan whine or transformer hum, which would persist for much longer time periods than concerts, and from which there may be no respite, save some form of noise control. Concert noise, on the other hand, is not continuous, varies in content, pitch, rhythm, and may occur relatively few times per year. While concert noise may be quite audible during an event, it may not materially affect the quality of life, unless it occurs very often as is the case at Shoreline Amphitheater, or is of very high level. There are many types of noise produced by the proposed project, including crowd cheering, PA system, automobile traffic, horns, etc. The intent of the acoustical analysis employed in the EIR is to characterize music noise as well as other types of noise with a uniform metric. Under these circumstances, application of a 5 decibel penalty to concert music noise levels for the calculation of combined concert, crowd and community noise for the purpose of assessing cumulative impacts would be inappropriate. This choice is supported by other noise analyses.

The United States Environmental Protection Agency (EPA) has compiled scientific information of the effects of noise exposure, as noted in EIR Appendix D (pp. A-139 - A-140).[21] In preparing these analyses, the EPA has included a number adjustment factors for community and noise character to be added to the 24-hour average Day-Night Noise Level, L_{dn}, to arrive at a "normalized" L_{dn} and estimate community annoyance. The adjustments are similar to those provided in ISO R1966, though the usage differs. (EPA relies entirely on the L_{dn} or L_{eq}, while ISO R1966 compares project noise with the ambient level exceeded 95% of the time.) The adjustments include a 5 decibel upward adjustment to the L_{dn} for pure tones or sounds with impulsive character. However, the EPA also includes additional adjustments for the character of the community noise environment in the absence of the intruding noise. The environment of the proposed ballpark is currently one of heavily used streets with some light industrial or warehousing activity. For a noisy urban residential area (near relatively busy roads or industrial areas) a downward adjustment of 5 decibels is applied by the EPA to the intruding noise, which would cancel the upward adjustment of

21. United States Environmental Protection Agency (March 1974), *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety*, Washington, D.C., Report No. 550/9-74-004.

5 decibels to account for tonal and impulsive character. Thus, no adjustment to the predicted music noise level would be recommended by EPA. Land uses in the project area are changing. As light industry and warehousing is lost, existing buildings are converted to live-work units, and residential apartment buildings are built, the street traffic in the area is likely to increase relative to today, so that the area is likely to remain a "noisy urban residential community," as defined by EPA (see, e.g. the cumulative traffic noise analyses results in the EIR in Table IV.F.2, p. IV.249). Therefore, no net upward adjustment would appear to be warranted on the basis of the EPA approach.

Maximum music levels were predicted and used in the EIR in addition to the one-hour average L_{eq} to characterize concert noise (see, e.g. Table IV.F.4, p. IV.258). The intent was to indicate how audible concert noise might be in the presence of existing background noise. For instance, although the concert noise L_{eq} might be similar to the existing L_{eq} , maximum noise levels may be such that they are easily heard above the existing noise, especially during lulls in nearby traffic, sirens, trucks, etc. In studies of concert noise from, for example, the Shoreline Amphitheater, it is the maximum sound level audibility of the noise that is measured, especially at receptor locations where the music L_{eq} cannot be measured reliably because the existing ambient noise levels are at about the same order of magnitude as the music noise even though the music noise may be more "noticeable." In these tests, no penalties are added to the music L_{eq}. The current trend in controlling concert noise is to place a limit on maximum sound levels.[22]

The commentor applies a overly conservative interpretation of the community response, equivalent to applying a further penalty to concert music levels, to account for the effect of lighting at night shown in "Table 4" of the comment letter. As a result, the comment suggests that large concerts would cause "vigorous community action" and "legal threats" (from commentor's Table 3). Visibility of noise sources is generally believed by the acoustical

22. See, e.g., Cavanaugh, W.J., and R.G. Cann, "Control and Management of Outdoor Concert Sound- A Review of Experience in North America," *Proceedings of InterNoise 96,* Liverpool UK, Institute of Noise Control Engineering, pp. 2407-2412.

engineering community to contribute to the awareness of the noise produced by that source. However, application of a penalty to account for the visible aspect of the noise source is very rare, if it is done at all. Examples of noise impact analyses that include lighted areas but do not apply penalties to visible sources include those normally done for highway noise, aircraft, rail transit systems etc. Lighting may contribute to negative community reaction, but that reaction should be considered with respect to human response to lighting, rather than noise. The cumulative effects would then be adequately represented. Including joint interactions of lighting and noise annoyance would overstate the overall noise impact if lighting impacts are analyzed elsewhere in the EIR (see section IV.C, pp. IV.25 - IV.45).

The commentor appears to apply the five decibel upward adjustment to both crowd and music noise levels when calculating the "corrected L_{eq}'s" given in "Table 2" of the comment. If the upward adjustment is to be applied per ISO R1966, the upward adjustment would be best applied to music noise levels only, because the crowd noise is more random in nature, and because the major concern expressed in the comments is music. However, the music noise has greater noise energy than crowd noise when averaged over time, so that the discrepancy is on the order of a decibel and does not change the change the conclusions obtained by commentor with respect to un-controlled music levels.

The commentor indicates a difference of 2 to 3 decibels between the levels exceeded 90% of the time and those exceeded 95% of the time. This is a reasonable assumption. However, the commentor assumes a decrease of ambient background noise levels exceeded 90 or 95% of the time with increasing elevation above the streets. While this was assumed for L_{eq} estimates, which include the total noise energy from both near and distant sources, the ambient background level exceeded 90 or 95% of the time is more often than not controlled by distant unidentifiable community noise sources, unless the receiver is close to a freeway or other continuous noise source. The levels exceeded 95% (L_{95}) of the time may actually increase with increasing elevation, because elevated receivers are more exposed to city sources than grade level receivers. For the purpose of applying ISO R1966, the better approach would be to assume that the level exceeded 95% (L_{95}) of the time is the same at all elevations.

Further, the commentor estimates the level exceeded 90% of the time at Location F by subtracting 8 decibels from the L_{eq} measured at Location C, which includes noise from nearby traffic. A more appropriate approach would be to assume that the background level is uniform over the area. The typical ambient background L_{90} is about 53 - 56 dBA during the week and 50 - 53 dBA during a Sunday, based on long-term measurements made at several locations in the project area (see EIR pp. III.118 - III.121). Assuming that the L_{95} level is 3 decibels less than the L_{90}, the background level per ISO R1966 would be about 50 - 53 dBA during a weekday and 47 - 50 dBA during the weekend. A reasonable assumption for use of the ISO R1966 would be an L_{95} of 50 dBA, which is actually lower than the levels employed by the commentor, and tends to slightly increase the estimates of community annoyance relative to that indicated by the comment.

The commentor indicates, in Table 4 of the comment letter, that if a 95 dBA (un-adjusted) limit were applied to the music noise levels, the community reaction would be reduced from "vigorous community reaction" to one of "widespread complaints" and "threats of community action," while with a 90 dBA limit there would be some "sporadic complaints." Thus, the commentor recommends that the 90 dBA noise limit be employed.

Employing the ISO R1966 method, using a 50 dBA assumption for the L_{95} at all locations, and applying the 5 dBA adjustment to music levels only, results in no change in the noise level increase (existing ambient to concert-related noise level) difference for Location C, as shown in Table 4 of the commentor's letter. However, the various noise level differences at the lower, middle and upper floors of Location F would be changed to produce a level difference of 19 dBA with no noise limit, 10 dBA with a noise limit of 95 dBA at the rim, and 5 dBA with a 90 dBA limit at the ballpark rim, with the corrections to the ISO methodology noted above. These noise level differences are independent of elevation above the street for these two particular locations.

The commentor applies a qualitative adjustment in estimates of community reaction to account for lighting. As indicated above, this should not be done. Without the lighting adjustment, the community response would be reduced to the following:

With no noise limit, from "legal threats & vigorous community action" in the commentor's table to "vigorous community action" using standard ISO Community Responses;

with a 95 dBA limit at the ballpark rim, from "widespread, vigorous complaints" to "widespread complaints;"

and with a 90 dBA limit at the ballpark rim, from "some complaints" to "sporadic complaints."

The commentor recommends that a limit of 90 dBA be applied to music sound levels at the ballpark rim. This limit is consistent with measures employed at other locations to limit large concert sound. For example, limits of 90 dBA for maximum sound levels measured with a 1 second averaging time at the rear lawn areas of concert amphitheaters were recommended by one report to control concert noise at residential receivers within 600 meters (about 2,000 ft.) of the concert area.[23] A similar voluntary limit of 92 dBA was considered for the levels exceeded 1% of the time (L_1) in any 30 minute period of the performance for the rear lawn area of the Walnut Creek Amphitheater in Raleigh, North Carolina.[24] The maximum sound level at the Walnut Creek Amphitheater in Raleigh was about 3 decibels greater than the level exceeded 1% of the time. These noise limits have been developed as a result of experiences with community response to concert noise, and are therefore likely to be effective.

The mitigation measure included in the EIR for concert noise at the ballpark has been reviewed during the public comment period on the Draft EIR, and additional analysis has been carried out for potential sensitive receptors in the Mission Bay area. Based on this review and analysis, the following concert noise mitigation measure is proposed, substituting for the measure on p. V.61:

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23. Cavanaugh, W. J., and R. G. Cann, (1996), "Control and Management of Outdoor Concert Sound - A Review of Experience in North America," *Proceedings of InterNoise 96*, Liverpool, UK, Institute of Noise Control Engineering, pp. 2407 - 2412.

24. Stewart, Noral D. (1995), "Two years of Sound Level Monitoring at Walnut Creek Amphitheater - Experiences and Results," *Proceedings of InterNoise 95*, Newport Beach, California. Institute of Noise Control Engineering, pp. 791 - 797.

Measure Not Included As Part of Project

Concerts at the ballpark featuring live amplified music without limits on maximum noise levels should be limited to about five per year. Additional concerts should be restricted as follows: project sponsor would perform a sound test, and on the basis of this test, establish a limit on music noise in the ballpark that would result in increases in exterior noise at representative residential receptors in the adjoining neighborhood of no greater than 3 decibels above the then-existing ambient hourly average (L_{eq}) noise levels at those receptor locations. With this mitigation measure, during lulls in the traffic and other community noise sources, music would remain detectable at locations in the vicinity of the ballpark because of music's tonal and percussive character, but would not cause substantial adverse community impact.

The applicability of the San Francisco Noise Ordinance is discussed above.

The following changes have been made to the second full paragraph on p. I.52 of the EIR:

Concerts at the ballpark featuring live amplified music without limits on maximum noise levels should be limited to about five per year. Additional concerts ~~should be restricted so that concert sound systems operate with a limit of 95 dBA for maximum music noise levels as measured anywhere at the proposed ballpark rim~~ would be restricted by a monitoring program to reduce their noise impacts outside the ballpark.

Comment

The effects of noise on sleep are one of several factors contributing to people's overt responses, such as complaints, to noise. It is recognized that a noise present when one is attempting to "fall asleep" can delay the onset of sleep.[1] However, to my knowledge, there are no research data which permit an estimate of the delay given a rock concert as the offending noise.

More data are available with respect to the probability of, once asleep, awakening to noise. Table 5 shows the estimated probabilities of awaking during a rock concert, assuming that [exposure] to the music should be five minutes or less in order to awaken someone. This duration is important because the probability of someone being awakened by a noise is a function of the duration of a noise as well as its sound pressure level. This relationship is implicit in the unit — SEL, or Sound Exposure Level — used in estimating the probability.

Table 5 [from Lukas comment letter]
Probability of Awakening* During "Large Venue" Rock Concerts with Apartment Windows Open or Closed and with and Without a Noise Limit at the Ballpark Rim

No limit or 104 dBA			
Location		Windows Open	Windows Closed**
#3, South Beach Marina and Steamboat Point Apartments		43%	13%
#6, North of King, east of Second St. -- apt. under construction	Top Floor:	48	15
	Middle Floor:	46	14
	Bottom Floor:	46	14

Limit at Rim = 90 dBA			
Location		Windows Open	Windows Closed
#3, South Beach Marina and Steamboat Point Apartments		23%	5%
#6, North of King, east of Second St. -- apt. under construction	Top Floor:	27	7
	Middle Floor:	25	6
	Bottom Floor:	25	6

* The probability of awakening is based on the assumption that the duration of music necessary to awaken someone is no longer than about 5 minutes, which is used to calculate the Sound Exposure Level. If music doesn't cause an awakening in that period, it may be unlikely that longer noise exposures will do so. Estimated probabilities are from: Federal Interagency Committee on Noise, "Federal Agency Review of Selected Airport Noise Analysis Issues," August 1992, pg. 3-12.

** A noise level reduction of 25 dB is assumed with windows closed.

The estimates in Table 5 suggest that about 50 percent of the people exposed to rock concert music and crowd noise at levels of 62 to 65 dBA outside their apartments are expected to be awakened by those sounds if the windows are wide open. If the windows are tightly closed, only 15 percent or so will be similarly affected.

If the rock concert noise level at the Ballpark Rim is controlled so that it does not exceed 90 dBA, the number of people awakened is expected to be about one half (approximately 25 percent less with their windows open and 6 or 7 percent less with their windows closed) that estimated with no limit on concert noise level. These data are suggestive of the number of people whose sleep onset may be delayed because of rock concert noise. In other words, if

the music can awaken someone, it should also be sufficient to prevent them from falling asleep, particularly if it is bothersome before going to bed.[2] (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

1. K.D. Kryter, *The Effects of Noise on Man,* 2nd Ed., Orlando: Academic Press, Inc., 1985, pp. 427-429.

2. K.D. Kryter, *The Effects of Noise on Man,* 2nd Ed., Orlando, Academic Press, Inc., 1985, Figure 10.33, pg. 441.

Response

The commentor employs the Sound Exposure Level (SEL) to describe sleep disturbance from large music events at the ballpark. The SEL descriptor is commonly used as a basis for developing community noise impact criteria, and it is particularly useful for non-steady noise levels, such as aircraft flyovers, train pass by's, etc. The use of the SEL for describing the sleep disturbance of a 5 minute piece of music is reasonable. However, the percentages assigned to awakening appear to be overstated for the case with windows open, as explained below.

At the upper floors of Location Cb, (this is Location 3, mid-level, in the acoustical analysis background report for the EIR) and Location Fc (this is Location 6, upper level, in the noise background report), the estimated music L_{eq}'s are 63 and 64 dBA, respectively, for uncontrolled large concert music. The commentor actually uses the first floor of Location C in the comment, but use of the upper floor is appropriate. The exterior SEL's associated with these sound levels for a 5 minute exposure period are 88 and 89 dB, respectively, obtained by adding 10 times the logarithm of the time duration in seconds to the L_{eq}. For the case of windows open, the interior SEL would be about 15 to 20 decibels lower. Assuming a 15 decibel reduction, the interior SEL would be 73 and 74 dB, respectively.

The probability of awakening at these sites with windows open would be 23 to 24%, roughly half the percentage indicated in Table 5 of the comment letter.[25] With windows closed, the

25. The probability of awakening by a single event of these SEL's would be given approximately by the relation: % Awakenings = 0.000007079xSEL^3.496. (Hodges and Shutt, *Airport Land Use Planning Handbook*, Prepared for CALTRANS, Division of Aeronautics, December 1993, pp. 6 - 29.)

noise reduction is normally assumed to be 25 to 30 decibels. One may expect that with the modern building materials used in the nearby apartment buildings, the higher noise reduction would be likely. However, assuming a 25 decibel reduction from exterior to interior, the interior SEL with windows closed would be 63 to 64 dBA, giving a probability of awakening of 13 to 14%, which is roughly consistent with the commentor's result for un-controlled music levels.

With a 90 decibel limit at the stadium rim, the resulting music noise levels would be less than community noise levels, so that the applicability of this approach is questionable. However, with a music level limit of 90 dBA, the combined crowd and music L_{eq} would be 58 and 59 dBA, for upper the floors at Locations C and F, respectively. (The music levels would be much less than the crowd noise with the model assumptions used.) The estimated exterior SEL's would be 83 and 84 dBA, respectively. With windows open, the interior SEL's are 68 and 69 dB, respectively, giving a probability of awakening of 18 and 19%, respectively. These are less than the 23 to 27% probabilities given in Table 5 of the comment letter. With windows closed, the interior SEL's would be reduced to 58 and 59 dB, respectively, giving probabilities of awakening of 10 and 11%, slightly higher than the commentor's estimate.

If music noise alone were considered for the case of the 90 dBA maximum music noise limit, the exterior L_{eq}'s at these locations are estimated to be 49 and 50 dBA, for which the exterior SEL's would be 74 and 75 dB. The probabilities of awakening become 11 and 12% with the windows open, and 5 and 6% with the windows closed, at the two respective locations, comparable with the commentor's projections.

If one considers that multiple events occur at a large concert, each with, perhaps, 5 minute duration, the probability of being awakened at least once increases with the number of events. Without going into details, the probability of awakening to at least one of three events with no noise controls and with windows open would easily exceed 50%. Therefore, the conclusions of the comment are not substantially changed as a result of the above

analysis, although some of the comment details might be considered inaccurate. The following new text has been added to Concert Noise Impacts on p. IV.259, second full paragraph, in the EIR:

> **In summary, concert and crowd noise from large music events would be noticeable and could be annoying to residents living in apartment buildings near the ballpark. Some residents might find it difficult to sleep or might have their sleep disturbed as a result of a large music event (see Mitigation Measures for Concert Noise in V.C. Noise Mitigation Measures, p. V.61).**

The commentor's conclusion regarding potential sleep disturbance/delay supports the implementation of a noise limit of 90 dBA at the ballpark rim to control concert noise levels if it is determined appropriate to reduce sleep disturbance due to large concerts at the ballpark. (See the response above, concerning an additional mitigation measure added to Chapter V of the EIR.)

Comments

The draft EIR categorized open air concerts at the ballpark featuring live amplified music without limits on maximum noise level as not a significant impact and suggested that the way to address that is to hold the decibels to 95 decibels, or something, and that the number of these events be about five a year. I have to tell you, the majority of our CAC members believe that that is -- disagree with that finding vehemently...

We also know that the noise is really difficult to put up with. There is a reason that...concert venues are not in residential neighborhoods. It is just not a good adjacency, is the reason. If you ever go to Bill Graham's Concord thing, it is like you are on the moon. There are no people for miles. That is because they are difficult to live next to. We think they need to go back and say that that is a significant impact and analyze what really needs to be done to make that possible. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

The DEIR has categorized open air concerts at the ballpark featuring live amplified music *without limits on maximum noise levels* as "not a significant impact," and has suggested two mitigations for these concerts: 1) that decibel limits be held at 95 dBA, and 2) that the number of these events allowable be limited to "about five per year." *The majority of the CAC members vehemently disagree with this finding, and believe that such concerts would, in fact, be a very significant impact on the neighborhood.* This belief is based on several facts. First, the attendance at these events could be approximately 25% more that the otherwise full capacity ballgame seating attendance. The impact of this additional attendance is nowhere analyzed in the DEIR in terms of increased intersection blockage and general traffic impacts.

Second, unlike baseball fans who might come to games on a regular basis, and who would eventually develop a workable strategy to get to the game, concert fans would likely be less informed and less practiced at getting to the event, leading to increased likelihood of personal car usage, less patronage of public transportation services, and generally more confusion in getting to and leaving the venue. Third, the level of sound annoyance produced by these concerts is, by the personal experience of many CAC members, quite significant. There is a reason that Bill Graham Production's Concord Pavilion, for instance, is located literally miles from any residential development. CAC members could think of no Bay Area open air venue where there was anything like the residential adjacency that such concerts would bring to the South Beach neighborhood. (Rick Mariano)

It was also stated that with regards to outside music events, you would hear that music in the apartments, but...those were stated as not being any sort of significant impact. To the people living down here and calling it home, it will be a significant impact. (Richard Dickerson, South Beach Marina Apartments)

The DEIR suggests that up to five full ballpark events with sound exceeding 95dBA would not constitute a significant environmental impact. The DEIR erroneously disassociates this 5 event sound level with the other 80 baseball events, for a total of 85 events. Five such additional events over the programmed 80 baseball events are a significant environmental impact requiring mitigation. (Martin Fay, Rincon Point – South Beach CAC)

Page V.61: Five unregulated concert events per year would constitute a significant environmental impact. This is a residential neighborhood where unregulated outdoor rock concerts should be prohibited outright.

Outdoor events with a controlled noise level may be acceptable. The Wilson, Ihrig report recommends such events have a noise limit at the ballpark rim of 90 dBA (Appendix S-1, p. 53), which may be acceptable on a few occasions during the year. The DEIR, however, increases that recommended level to 95 dBA without explanation or analysis. Noise in the residential neighborhood remains easily detectable and annoying with a 95 dBA rim level.

Events with a rim noise level of no greater than 90 dBA may be permitted, with the consent of a mitigation monitoring committee composed of City officials and neighborhood representatives. (Steven L. Vettel, Residential Properties Group)

Response

The final determination as to significant environmental impacts will be made by the City Planning Commission and Redevelopment Agency in the EIR certification action. The EIR suggested that five or fewer large music concerts should be considered occasional events that would not cause substantial permanent environmental changes, and, thus, have not found that this small number of events should be a significant environmental impact as defined by

CEQA. The potential temporary physical changes in local noise levels that could be caused by major rock music concerts have been disclosed in the EIR, and further information is presented in these Responses to Comments on the Draft EIR, including some revisions to data presented in the Draft EIR. This information will enable a reasoned determination by the Planning Commission and other decision-makers as to the significance of the impact and the need for mitigation measures or other conditions of approval as part of their actions on the ballpark project.

To help clarify the evaluation of concert noise effects, the following additional text has been included at the end of the section on "Evaluation Criteria" on page IV.244:

> **If increases in the overall hourly average noise level (L_{eq}) in the sourrounding area caused by amplified music were limited to less than three decibels, substantial community complaint is not likely to occur. At this limit, music would be noticeable at many nearby receptors because it has a different character than the ordinary community noise, but would not be expected to cause substantial community complaint, and would not be considered a substantial adverse change in the environment.[13]**

The following note has been added to p. IV.263 of the EIR in Noise Impacts. All subsequent notes have been re-numbered sequentially.

> **13. Wilson, Ihrig & Associates, Inc., *San Francisco Pacific Bell Park at China Basin Acoustical Analysis of Impact from Stadium Noise*, February, 1997, p. 28.**

Possible noise controls for music noise are described in the Noise Mitigation section of Chapter V in the EIR (p. V.61). The mitigation for concert noise has been revised to be more stringent response to comments on the Draft EIR (see the end of the third Response under General Concert Noise, above.

Concert Noise In Potrero Hill Area

Comments

In addressing some of the issues about light and sound and possibly wind not being studied in the areas immediately adjacent to the ballpark, if there is very little impact of those things,

especially light and sound on the ballpark area itself, I hate to say this, but it doesn't take a rocket scientist to think that further away is not going to have any worse impact. (Neil Rabin)

The DEIR does not adequately address the [e]ffect that the concerts and ballgames will have on Potrero Hill in terms of noise, air and light pollution. Sound studies performed were inadequate and used testing locations furthest from the stadium (Mariposa and De Haro). What about the [e]ffects that the increased traffic and concert noise will have on homes located east of De Haro Street, as most homes on the Hill are? (Sarah Ames)

Portrero Hill will also suffer noise pollution. Compare our geographic location vis-a-vis the stadium site to the Palo Alto/Mountain View dispute now going on because of excessive noise from events. (Mariuccia Iaconi, PLAN on Potrero Hill)

Noise impact on Channel residents, south of the channel land uses, Dog Patch and Potrero Hill is not adequately analyzed. (Martin Fay, Rincon Point - South Beach CAC)

It is not entirely clear whether the data for the various environmental elements were generated independently or whether two or more separate elements were considered interactively when logic and common sense dictated. For example, the Environmental Noise Model (ENM) supposedly considers wind, temperature, and topography but there is no indication that the various wind tunnel scenarios used to project wind impacts were integrated into the noise determination....

Keeping in mind that noise energy doubles every 10 dBA, one can only sympathize with those lucky China Basin residents. The EIR noise element never does consider the effect of fog and low cloud ceilings nor the "sound skipping" potential of the adjacent Bay surface. Will a three-sided stadium bounce sound off cloud banks to be deflected--God knows where? Will fog attenuate high frequency sounds so that music is reduced (especially rock bands) to dull, low frequency beats? (Silva B. Creg)

Response

Receptor A (as shown in Figures III.F.1, p. III.116, and IV.F.2, p. IV.253) is east of De Haro Street, in a quiet residential area with little traffic and thus has one of the lowest background noise levels on the northeast side of the hill. Receptor A was chosen to represent the residential area of Potrero Hill most exposed to the project with the quietest ambient noise environment on the northeast side of the hill. This location is considered to be representative of those most likely to be affected in this neighborhood by ballpark and concert noise.

The existing ambient L_{eq} noise levels in Potrero Hill would not be appreciably affected by activities at the ballpark. This does not mean that the activities would be undetectable. As indicated in the EIR, ballgame crowd noise (p. IV.255) and music from large concert events (p. IV.257) might occasionally be detectable at some areas of Potrero Hill.

Prevailing meteorological conditions do have an effect on noise, and if the ambient noise level away from the project is low (i.e., away from city street traffic), the project noise might cause an impact, even though none was determined near the source. This is why noise impacts at Potrero Hill were investigated at a comparatively quiet location at Potrero Hill. The results of this investigation indicate that project noise levels would be less than existing ambient noise levels, even with a temperature inversion in place. Further, if a temperature inversion caused an increase in project noise, there would likely be a commensurate increase in ambient noise from I-280, located between the project site and Potrero Hill, and in noise from the City in general. The wind direction is principally toward the southeast and east, away from the Potrero Hill area. In view of these factors, a substantial noise increase by the project would be unlikely, although as noted in the EIR (p. IV.257), concert noise would be audible from time to time.

It is useful to understand some basic information about the effects of weather conditions on noise production in order to understand the analysis and conclusions related to Potrero Hill. The basic noise analysis was performed with no wind, no temperature gradient, an air temperature of 25°C (77 degrees Fahrenheit), and 30% relative humidity (see EIR, pp. IV.243 - IV.244 for a discussion of analyses methods used for concert and crowd noise). The topography was taken from a USGS topographical map.

There are typically three categories of temperature profiles: 1) constant temperature with altitude, 2) lapse condition: in which the temperature is higher close to the ground than up in the atmosphere, and 3) inversion: during which the temperature is colder close to the ground. The first condition generally occurs on foggy and breezy days, when there is no opportunity for the sun to warm the ground appreciably, or where turbulent mixing of the atmosphere

would destroy any inversion condition. The second condition is a typical California day, when the sun warms the earth, and temperatures at ground level are elevated above that of the atmosphere. Further, there is normally a decline of temperature with increasing elevation, just as the temperature in the mountains is usually lower than in valleys. The third condition occurs in the fall in the San Francisco Bay Area, and more often in other parts of the SF Bay Area than in the City. The change of temperature with elevation (the temperature gradient) is a measure of the strength of the inversion or the lapse condition.

Sound will travel faster in air at high temperatures than in air at low temperatures. During a lapse condition, sound will travel faster closer to the ground than at higher elevations. The sound propagation path will tend to "bend" upwards during a lapse condition, and create shadow zones, where noise is markedly attenuated (quieter). In contrast, during an inversion, the ground air is cooler than air at higher elevations, and sound travels slower near the ground than high above the ground, thereby causing the wave front to "bend" back to the ground. Typically, noise attenuates less with distance during an inversion than during a lapse or uniform condition. Typical temperature inversions are on the order of a few degrees Celsius per 100 meter change in elevation.

Sound generally attenuates with increasing distance over reasonably flat ground where there are no obstructions, such as large buildings, between the source and receiver, whether or not an inversion is in place. Thus, the predicted sound levels in the Potrero Hill area from crowds or concert noise at the ballpark would be expected to be higher than sound levels that might occur at larger distances, but quieter than locations closer to the ballpark. There may exist conditions where receivers are shielded by terrain, and, because of an inversion, the sound waves bend over the top of the terrain. In this case, the sound level could increase with increasing distance from the source, but, even in this case, the sound level would be expected to be less than the line-of-site condition assumed in the noise analysis model. Thus, sound levels due to ballpark activities would be expected to be lower at distances beyond 6,800 ft. than at Potrero Hill, regardless of inversion effects.

A wind speed gradient has a similar effect as a temperature gradient. A wind gradient is the measure of the increase of wind velocity with increasing height above the ground. Sound waves tend to refract downward in the downwind direction, and refract upward in the upwind direction. In the downwind direction, the sound attenuation with distance from the source is less than predicted without a wind gradient. In the upwind direction, the sound attenuation with distance from the source is greater than predicted without a gradient. A temperature gradient will not exist in the presence of wind gradient, so the effects are not additive.

Additional modeling was undertaken to test the significance of temperature inversions and wind gradients. The sensitivities of the model to temperature inversions and wind gradients were found to be 1 to 3 dBA at Potrero Hill (as mentioned on p. IV.243, paragraph 3), the location most likely to be affected by wind and temperature gradients within view of the proposed ballpark. The effects of temperature and wind gradients would be less at locations closer to the ballpark than at Potrero Hill. The effects of temperature inversions and wind gradients were therefore not considered for most of the modeling. However, because the predominant wind directions are towards the east and southeast, away from sensitive receptors in the Potrero Hill area, the effect of wind was included in estimates of noise at South Beach Harbor (see Response on Concert Noise In South Beach Marina Area, below). Ignoring the prevailing wind at other locations situated to the west and southwest, such as at Potrero Hill, results in slightly conservative (that is, louder) estimates of ballpark noise levels for periods when the prevailing wind is in force. Further, the normal condition in the area is one of a temperature "lapse," and employing a uniform temperature assumption results in slightly conservative estimates of ballpark noise for normal conditions.

Noise can be partially reflected by low temperature regions in clouds and density changes in the atmosphere, but these effects are difficult to quantify, and they are likely to be small relative to the effect of a temperature inversion. There is little or no information concerning reflection of community noise by clouds and air density variations. To the extent that partial reflection of sound occurs, the nature of the scattering is likely to be random due to natural turbulence and variation of the boundary between cloud and open air, so that there would be

no focusing effects of sound by clouds. Rather, the sound waves would tend to turn up as they encounter the cool air of the cloud (a lapse condition). In this case, much of the sound from the ballpark would be refracted away from the ground, rather than toward the ground.

Sound is not necessarily attenuated significantly by fog. The water particles are very small relative to the wavelength of sound in air, and therefore do not interact appreciably with the sound wave. Further, there is generally no temperature gradient in fog, so that the modeling of uniform temperature with elevation is appropriate for the often foggy conditions typical during San Francisco summer evenings.

Humidity does have an effect on atmospheric absorption. For example, a relative humidity of 30% and temperature of 25 degrees C (about 75°F) were assumed for modeling purposes. The excess attenuation provided by the atmosphere at 30% relative humidity, 25 degrees C, and 500 Hz, is about 0.32 dB/100 meter, or 0.98 dB/1000 ft. of distance from the noise source. Thus, one may expect an excess attenuation due to atmospheric absorption of about 5 decibels at 500 Hz at 5,000 ft. (roughly comparable with Potrero Hill receiver) and about 10 decibels at 10,000 ft. This attenuation is *in addition* to that related to spreading of acoustical energy as the sound propagates away from the source, ground effects, etc. At 90% relative humidity, the excess attenuation due to atmospheric absorption is about 0.25 decibel per 100 meters, or 0.76 decibel per 1,000 ft. At 5,000 ft., the excess attenuation would be about 3.8 decibel, rather than 5 decibels, and at 10,000 ft., the excess attenuation would be 7.6 decibel, rather than 10 decibels. The differences between excess attenuation at 30% relative humidity and 90% relative humidity are on the order of 1.2 and 2.4 decibels at 5,000 and 10,000 ft., respectively. These differences are smaller than other uncertainties concerning receiver background levels, temperature inversions, wind gradients, etc., and would not likely be noticed by the average listener. For these reasons, an assumption of 30% relative humidity was employed for noise predictions.

With respect to the conditions that occur at Shoreline Amphitheater, the primary factor in the audibility at relatively distant locations is the amount and number of temperature inversions

in that area. At Shoreline, very strong temperature inversions can occur (on the order of 10°C/100 m elevation), which causes concert noise at an 11,000-ft. distance to be clearly audible. If a similar strong inversion of 10° C/100 meters were to occur on the east side of the City, the predicted large concert sound levels in Potrero Hill would be about 10 decibels higher than predicted for uniform temperature conditions, and would increase the hourly L_{eq} in the Potrero Hill area by 3.5 decibels. This increase would make concert sounds clearly audible on Potrero Hill and possibly annoying to some, although not a significant impact under the CEQA definition. The typical temperature gradient during an inversion is on the order of 1 degree C/100 meter, an order-of-magnitude less than that observed in the Palo Alto/Mountain View area; therefore noise propagation similar to that which occurs at Shoreline is considered substantially less likely for the China Basin ballpark site.

San Francisco is known for late afternoon and evening winds, drawn by Central Valley heating during the day. These winds destroy temperature gradients. The probability of experiencing noise impacts from the proposed ballpark is comparable with the probability of experiencing a temperature inversion similar to the extreme inversions occurring in Palo Alto.

Wind tunnel data were not included in the modeling of noise levels. For most of the modeling effort, wind was assumed to be zero, resulting in a slightly conservative estimate of noise levels in areas west and northwest of the proposed ballpark for prevailing wind conditions, because wind effects probably would reduce noise levels slightly there. A finite wind assumption was made for modeling noise levels in the harbor area east of the proposed ballpark. (See discussion above concerning assumptions used for modeling ballpark noise.)

One commenter indicates that the effect of fog, low cloud ceilings, and the sound skipping potential of the adjacent bay surface were not considered. (See discussion concerning meteorological conditions, and the effects of fog and clouds, above.) Fog should not reduce high frequency sounds any more than clear air does. A three sided ballpark may reflect sound into the upper atmosphere, but such sound would not be reflected by clouds. The

orientation of the ballpark is such that most of the sound reflected from the seating area would be largely directed to the east and south over the bay. For residential receivers located northeast to southwest of the proposed ballpark, the orientation of the ballpark is beneficial in controlling ballpark noise.

With respect to water, sound is virtually entirely reflected by water. However, the effect of water would likely be small for most receivers, and would be limited to those located immediately adjacent to the water, who could "see" a reflection of the entire stadium in the water. In this case, the noise increase would be about 3 decibels. The noise prediction model assumes a hard reflective ground surrounding the ballpark, for which the model includes an upward adjustment of about 0 to 5 decibels to account for reflection, though the amount depends on frequency and height of the source and receivers. For receivers close to the ground, the upward adjustment is on the order of 3 decibels, similar to that for water. Therefore the model does account for the effects of sound on water.

Comment

Crowd and construction noise levels may reach 63 dBA and 85 dBA, respectively, and be tolerated or even unnoticed during the day with an ambient level of 65 dBA, but at night with ambients around 55 dBA, PA systems and rock bands blasting at 87 dBA and 95-109 dBA, respectively, will cause excruciating irritation and, I expect, severe political repercussions. (Silva B. Creg)

Response

It is not appropriate to compare ambient noise levels at, for example, Location A in the Potrero Hill area, with the noise levels at the ballpark site. As shown in Table IV.F.4, p. IV.248, the typical ambient noise level at Potrero Hill is 55 dBA L_{eq}, and the total noise level, with a large concert, is projected to be 56 dBA L_{eq}. The difference of 1 decibel generally would not be noticed by most receptors. The total noise levels with a large concert at Location Fc, on 2nd Street between King and Townsend Streets near the ballpark, are projected to be 66 dBA L_{eq}, compared to the ambient of 60 dBA L_{eq} . In this latter case, unlike at the Potrero Hill site, the noise increase would be very noticeable.

The noise analysis for a large rock concert shows no analysis locations at above 80 dBA. Noise levels of 104 dBA are predicted for music at the upper rim of the ballpark, not at any sensitive receptors located outside the ballpark.

Concert Noise In South Beach Marina Area

Comments

The proposed ballpark will be constructed adjacent to South Beach Marina, an existing, water-oriented recreational facility authorized in BCDC Permit No. 2-84. A number of the occupants of that marina have contacted the Commission staff raising concerns about potential ballpark impacts on the marina. These concerns have included: ... (3) an increase in noise for marina occupants (the concern appears to be more with potential special events, such as music concerts, than with noise associated with ballgames). (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

The sound impacts...This is the backup documentation that you don't even have in your EIR. They don't mention a harbor. They mention a harbor, but they don't -- they say it is there. It doesn't study it at all. (Joe Boss)

Impacts on use and enjoyment of the South Beach Yacht Harbor are also not adequately covered, including noise... (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Though it has been brought up at several CAC meetings and at public meetings, the DEIR has ignored the existence of the South Beach Harbor...noise...problems must be studied as to the effect on this existing Maritime use of the immediate area...

...South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...noise...that will accompany the new ballpark. (Janet Carpinelli)

IV.252: Why are there no measurements in the marina or in the South Beach park? Both are recreational spaces in the immediate area. Noise travels over water pretty well. What impacts for people in harbor or on boats attempting to talk to each other, appreciate peace and quiet or communicate while maneuvering their boat? (Sue C. Hestor, Advocates for South Beach Harbor)

No analysis is made on the impact of noise on the harbor tenants. During summer weekends, there is a significant amount of recreational overnight use of the harbor, particularly by people who live on the Peninsula. (This would probably increase if people are trying to avoid game crowds during mid-day hours by arriving the night before they use

their boats.) Night games and music events will significantly affect the quality of life at the harbor for such uses...

...Noise is also in part wind-borne, and the harbor again will be the most affected. Although it is not a residential area, it is a facility to which tenants go to enjoy peace and quiet, much like some people go to a park or wilderness area. Although to some extent unavoidable, mitigation and reduction is possible, but mentioned nowhere in the EIR as it pertains to the harbor. (Doug Gooding, CAC member)

The environmental impacts on South Beach Harbor warrant specific attention. Impacts on this most immediate neighbor of the new ballpark have been seriously overlooked. The marina was treated as though it weren't even there. This reflects an inadequate understanding by DEIR authors of the marina's function and role as a recreation and open space resource... The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... noise... impacts on harbor use [are not] adequately addressed. (Martin Fay, Rincon Point - South Beach CAC)

Amazingly to me, no analysis was done on the effects of the ballpark on the harbor in terms of... sound intrusion,... (Rick Mariano)

[T]he draft EIR virtually ignores the South Beach Harbor. It is, to me, really quite a glaring omission...They did not do sound out in the harbor. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

Response

Three additional locations were studied in the South Beach Marina and Park area (sites Ha, Hb, and Hc), which have been added to EIR Figure IV.F.2, p. IV.253, as shown on the following page of this C&R document. Noise measurements were performed at site Ha. Sites Hb and Hc were used for prediction of future noise levels. Site Ha, at the southwest tip of the boat harbor (on the harbor walkway), is approximately 700 ft. from home plate, site Hb is in the South Beach Park, adjacent to The Embarcadero, and site Hc is approximately at the middle of the boat harbor.

The ambient noise level at the harbor walkway was measured at 57 dBA L_{eq}. The ambient noise level during a weekday evening at the South Beach Marina is calculated to be 57 dBA. At the South Beach Park site (Hb), the ambient hourly noise level is controlled by traffic on King Street, and is about 65 dBA L_{eq} based on measured noise levels on King Street and on traffic volumes.

SOURCE: EIP Associates

GIANTS BALLPARK

Figure IV.F.2 (Revised) Crowd and Concert Noise Analysis Locations

The harbor was not analyzed in the Draft EIR because the harbor is not considered a noise-sensitive receptor, and therefore noise effects from occasional large concerts would not be considered to be a significant effect. The reasons for this are: 1) the harbor is not a residential area, 2) the harbor is not a park where quiet is a basis for use, and 3) the harbor is a staging area for recreation. People may occasionally stay over night on board boats per harbor rules which permit such occupation as a convenience for boat owners, but length of stay is limited and no one may live aboard their boats. Typically, the boat harbor is used as a storage area for boats, and a fraction of the boats are in use at any time, either for the purpose of maintenance, preparation for sailing, or returning from sailing. The majority of boats are normally unoccupied at any given time. Some harbor-related activities are somewhat noisy in themselves, although not necessarily annoying to those nearby who are accustomed to these types of marina noises.

Computer model projections of future noise levels at sites Ha (harbor walk), Hb (South Beach Park),and Hc (approximate mid-harbor) indicate that large music events would generate noise levels in excess of the existing ambient noise levels by about 7 dBA L_{eq} at the harbor walk area near the ballpark (Ha), by about 12 dBA L_{eq} in South Beach Park (Hb), and about 10 dBA L_{eq} in mid-harbor (Hc).

The following new text has been added on p. IV.259 after the first sentence on the page:

> **Noise levels could increase by about 7 dBA L_{eq} at the harbor walk area near the ballpark (see Figure IV.F.2, p. IV.253, site Ha), and by about 12 dBA L_{eq} in South Beach Park (site Hb) and about 10 dBA L_{eq} in the mid-harbor area (site Hc).**

The actual crowd and music noise from large music events in the harbor area would vary, depending upon the listener's proximity to the ballpark structure and the barrier effects of different portions of the structure. The modeled location along the walkway bordering the harbor (site Ha) is at the southwest corner of the harbor and would be somewhat shielded from ballpark noise by the scoreboard structure. The middle harbor site (Hc) would be less shielded by structures bordering the proposed ballpark than the walkway, and is likely to be

reasonably representative of harbor noise increases from concert noise and crowd noise. Occasional strong westerly winds (on the order of about 6 meters per second, or about 15 miles per hour) may increase music noise in portions of South Beach Park; however, a commensurate increase in background community noise may also be expected there, because much of the community noise comes from the southwest; west, and northwest, upwind from the park. Therefore, the difference between existing ambient and project-related noise would not change substantially.

Small music events would generate noise levels such that existing noise levels would not be appreciably increased. For example, at the harbor walk area, the existing ambient noise level of 57 dBA L_{eq} would increase by about 2 decibels to 59 dBA L_{eq} with small-event music and crowd noise.

If large music event noise levels were limited to 95 dBA at the rim of the ballpark, total noise level increases in the harbor area would be less than those reported above. At the middle of the harbor, the total noise increase would be about 9 decibels, primarily because, at this location, crowd noise tends to dominate music noise. At the harbor walk (Location Ha) and South Beach Park (Hb), noise increases would be about 3 and 5 decibels, respectively.

Implementation of a 90 dBA music level limit at the ballpark rim (including at the top of the scoreboard) would reduce the total L_{eq} noise levels to 59 dBA L_{eq}, or 2 decibels above the ambient noise level at the harbor walk adjacent to the ballpark site (site Ha). At the park, noise levels would be about 67 dBA L_{eq}, or 2 decibels above the ambient at this location (Hb). Noise levels in the middle of the harbor would remain about 9 decibels above ambient with a 90 dBA limit at the rim of the ballpark, at 66 dBA L_{eq}, mainly from crowd noise.

An additional analysis was made of the possibility of speech interference at the Marina during large concerts. At a separation distance of 1 meter two individuals may engage in conversation with normal voice and 95% sentence intelligibility in the presence of ambient

noise with energy averaged sound level of 66 dBA. A distance of 1 meter (about 13 ft.) is perhaps representative of discussions occurring within the cockpit of a yacht. At 2 meters (6.5 ft.), the normal acceptable noise level for speech is reduced to 60 dBA[26]. During negotiation of the harbor, commands and directions are normally given with a loud voice or shouting. Assuming a typical shouting distance of 12 ft. (about 4 meters), the level of continuous noise during which reliable communication would be barely possible is about 71 dBA.[27] The L_{eq} due to crowd noise at the ballpark would be about 65 dBA, with a maximum noise level of 76 dBA during the most vigorous cheering. The nature of ballpark noise is such that it varies rapidly over time, and there are numerous periods of relative quiet, during which conversation or commands may take place. This condition is in contrast to highway noise, which is more steady with time.

The estimated continuous music L_{eq} for large productions would be about 62 dBA in the middle of the harbor, with a maximum of 68 dBA during a particularly loud passage; these noise levels are insufficient to interfere with normal harbor activities and entering or exiting the harbor. During maximum cheering by the crowd, the maximum sound level accounting for both music and crowd noise could be about 76 dBA, which could interfere with conversation, but only while cheering occurs, which may be limited to short periods of times. Secondly, maximum level cheering does not occur with every cheer, which reduces the potential for interference. No difficulty is expected for communication between crew during ball games or concert events.

Model projections indicate that crowd noise alone, from ball games, would raise total noise levels above the existing noise levels by 2 dB at site Ha in the yacht harbor, and 0 dBA at site Hb in the park. The negligible increase in the park is due to an assumed high existing ambient sound level of 65 dBA, caused by traffic along King Street. Therefore, crowd noise

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26. *Information on Levels of Environmental Noise Requisite to Protect the Public Health and Welfare with an Adequate Margin of Safety*, U.S. Environmental Protection Agency, March 1974, Washington, D.C. Report No. 550/9-74-004.

27. Glorig, A., "Criteria for Noise and Vibration in Communities, Buildings, and Vehicles," *Noise and Vibration Control*, Ed. L. L. Beranek, McGraw Hill Book Co., 1971, p. 559.

alone would not be considered to be a significant noise effect in the South Beach Marina area.

Comment

There is one major omission: The South Beach Marina apartment complex (Location #3) is a 14-story building. Thus, it requires a noise analysis at different elevations similar to those accomplished at Location #6 and at other apartment buildings (Locations #5 and #7, as examples). (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

Response

The Draft EIR presented lower-floor noise impacts for crowd and concert noise at the South Beach Marina Apartments, located on Townsend Street at Colin P. Kelly, Jr. Street (at Location C as shown on Figure IV.F.2, p. IV.253). At upper stories of the South Beach Marina Apartments at the 14th story (43 meters, or 140 ft. above mean sea level), projections indicate that for large music events, the total noise, including music, crowds, and existing community noise, would be about 65 dBA L_{eq}, exceeding the existing estimated ambient noise level of 57 dBA L_{eq} by 8 dBA. The projected noise levels for the upper stories at this location are about two decibels less than those projected for upper stories of the building now under construction at Location F, across King Street from the ballpark site on the east side of Second Street, where the existing ambient noise has been modeled at 60 dBA L_{eq} and total concert/crowd noise is projected to be about 67 dBA L_{eq}. Note that this latter value is a correction of the 66 dBA shown in Table IV.F.4, p. IV.258 of the Draft EIR; this total hourly L_{eq} figure was incorrectly rounded. This correction establishes a change in L_{eq} at the upper floors at Location F of 7 decibels rather than the 6 shown in the table.

Small music events would produce a total noise level in excess of the existing ambient community noise level by 2 dBA at Location Cc (14th Floor), increasing from 57 dBA to about 59 dBA L_{eq}. This L_{eq} would include primarily crowd and existing community noise. The projected maximum music noise level at crescendos and loud passages would be about 60 dBA, without mitigation, and would, therefore, be easily perceived. (It is assumed that maximum music noise levels would be 10 decibels higher than the music L_{eq} for small concerts).

Crowd noise alone, from ballgames, would generate total noise levels of about 60 dBA L_{eq}, approximately 3 decibels above the estimated ambient noise, at the upper floors of the South Beach Marina Apartments. This would not result in a significant noise impact, although some residents of upper floors facing the ballpark site would hear crowd noises, especially with windows open.

The following revision has been made to the second sentence in paragraph 3 on p. IV.257, to reflect revised calculations for Location Fc:

> **At the upper floors of the proposed apartment building north of King Street and east of Second Street (Location F) the noise increase would be up to ~~6~~ 7 decibels, due largely to music.**

The following new text has been added to pp. IV.257 and IV.261 to reflect the additional information about upper levels at the South Beach Marina Apartments:

On p. IV.257, at the end of paragraph 3:

> **At the upper floors of the South Beach Marina Apartments at Townsend and Colin P. Kelly Jr. Streets (Location C), the exterior noise level would be about 65 dBA L_{eq}, about 8 decibels above the existing ambient noise level of 57 dBA. This increase would be due mainly to music sound.**

On p. IV.261, at the end of the first full paragraph:

> **Even so, the combined maximum music and crowd noise levels would be less that the existing L_{eq} at almost all locations, except at the top floor of the ~~proposed~~ approved apartment building north of King Street and east of Second Street (Location F), where the combined maximum level would be roughly 6 decibels higher than the existing ambient L_{eq}, and at the top floor of the existing South Beach Marina Apartments (Location C) where the combined maximum level would be about 7 decibels higher than existing.**

The following additional and corrected lines have been added to Table IV.F.4, p. IV.258 to show results of the analysis of upper floors for Location C for full capacity music events and to show corrections to the analysis results for upper floors of Location F:

Location	Existing Weekend or Evening Hourly L_{eq}	Project Music Noise Level (dBA)		Music Plus Crowd Noise (dBA)		Total Noise (dBA)	
		Hourly L_{eq}	Max Level	Hourly L_{eq}	Max Level	Hourly L_{eq}	Change in Hourly L_{eq}
Cc* **Townsend & Colin P. Kelly Jr. Streets**	**57**	**63**	**69**	**64**	**72**	**65**	**8**
Fc* **Approved** Apartments North of King, East of 2nd Streets	60	64	70	66	74	**67**	**7**

* top floors

The following additional line has been added to Table IV.F.5, p. IV.260 to provide results for upper floors of Location C for partial capacity music events:

Location	Existing Weekend or Evening Hourly L_{eq}	Project Music Noise Level (dBA)		Music Plus Crowd Noise (dBA)		Total Noise (dBA)	
		Hourly L_{eq}	Max Level	Hourly L_{eq}	Max Level	Hourly L_{eq}	Change in Hourly L_{eq}
Cc* **Townsend & Colin P. Kelly Jr. Streets**	**57**	**50**	**60**	**54**	**64**	**59**	**2**

* top floors

The projected music noise level alone at the exterior of the building at Location C (14th floor) is calculated to be 63 dBA. Implementation of a 90 dBA noise limit at the ballpark rim (including the top of the scoreboard) would reduce the music noise levels to 49 dBA L_{eq}, 8 decibels below the assumed ambient. The total noise under these sound level limits would include crowd noise and existing community noise, which would not be reduced by music noise limits. Model projections indicate that the total noise would be 61 dBA L_{eq}, 60 dBA, 3 decibels over the existing ambient, with a 90 dBA restriction. In this case, the crowd noise would be the controlling factor, and would be similar to ballgame crowd noise analyzed in the EIR on pp. IV.251 - IV.256. Maximum level music sounds would still be detectible, although with a 90 dBA music noise limit maximum level sounds would be less than the existing L_{eq}.

In addition to the analysis of an upper level for the South Beach Marina Apartments, a second set of modeling points were included, designated as Locations La, and Lb, for 4 and 11 meters above grade (about 12 and 35 ft.), respectively, for the Steamboat Point Apartments to determine whether a slight reorientation of the ballpark structure would change the noise impact from a large concert event. (The reorientation was accounted for in other sections of the Draft EIR, but a separate noise analysis was not prepared, as the change would not affect most sensitive receptors studied in the concert noise analysis.) This additional Steamboat Point Apartment location is at the extreme southern edge of the apartment complex, facing King Street, and is south of the original location analyzed in the noise discussion by about 150 ft. This location, like that of the South Beach Park area, has partial line-of-sight between the ground floor apartments and the location assumed for speakers for a large concert production, and a clearer line-of-sight between the upper floors of the apartment building and the bank of speakers assumed to be used for a major concert event. The crown of the eastern edge of the ballpark, or concourse level, is assumed to be 8.5 meters elevation, or about 28 ft., above sea level in the middle of the east side of the structure between the King/Second Street corner and the scoreboard structure. This section of the ballpark structure is the lowest portion of the building and provides the least amount of noise barrier.

The projected noise levels at the ground floor apartments are similar to those obtained for the Park (site Hb) discussed in the previous Response, and would increase with elevation. The southern facades of these apartments are thus the most exposed of all apartments considered in the noise analysis. The ambient hourly L_{eq} is assumed to be 65 dBA at all floors, as there is a high volume of traffic on King Street.

The increase of the hourly L_{eq} over ambient for large concert events would range from about 12 decibels at the ground floor (a total L_{eq} of 77 dBA from concert and crowd noise) to 17 decibels at the third floor (a total L_{eq} of 82 dBA). These levels decrease rapidly as the receiver moves northeast in this building complex, until the barrier insertion loss provided by the tall portions of the ballpark structure (roughly 150 ft. above grade) shields the receiver;

this shielding effect is apparent by the middle of the Steamboat Point Apartments, as shown by the analysis results at Location E in EIR Table IV.F.4 (p. IV.258).

The following new text has been added on p. IV.259 at the end of the last paragraph:

> **At the southern-most portion of the Steamboat Point Apartments, on King Street nearest the ballpark site, analysis shows that a large concert event would increase ambient noise levels by 12 to 17 dBA L_{eq}. This large increase is predicted based on assumptions that the concert speakers would be mounted up to 30 ft. high and located in centerfield; this location would mean that speakers would be on about the same level as the top of the ballpark bleachers and that sound could travel directly toward the upper (third) floor of the King Street apartments with less shielding from the ballpark structure than is available at other nearby residential locations.**

The results of analysis of the King Street side of the Steamboat Point Apartments have been added to Table IV.F.4, p. IV.258, as follows:

Location	Existing Weekend or Evening Hourly L_{eq}	Project Music Noise Level (dBA)		Music Plus Crowd Noise (dBA)		Total Noise (dBA)	
		Hourly L_{eq}	Max Level	Hourly L_{eq}	Max Level	Hourly L_{eq}	Change in Hourly L_{eq}
La[4] South Edge Steamboat Pt. Apts,	65	77	83	77	83	77	12
Lb[4] King St. Side	65	82	88	82	88	82	17

Limiting large concert sound levels to 90 dBA maximum at the rim of the ballpark as suggested by the commentor would reduce predicted total cumulative hourly L_{eq} levels to about 68 dBA at the ground floor and 70 dBA at the top floor. Music noise still would dominate the crowd noise. The increase of cumulative noise over ambient would be about 3 decibels at the ground floor and 5 decibels over ambient at the top floor with a 90 dBA limit on music sound at the ballpark rim. See Responses above, under General Concert Noise, for a revised mitigation measure for concert noise effects that would provide for similar noise reduction.

The analysis of a major music event for this EIR has assumed that the main event speakers would be located in center field, permitting additional patrons to be seated on the grass in the infield area, and that speakers would be mounted on a tower that could be up to 30 ft. tall. If the main speaker tower were located closer to home plate, rather than in center field, as is assumed here, the line-of-sight condition at Location L adjacent to the southernmost apartments in the Steamboat Point complex would again be interrupted by the 150-foot high portions of the ballpark structure, with a substantial reduction in predicted sound levels at Locations La and Lb. For example, if the sound system were located at second base, the predicted music levels at Locations La and Lb would be reduced to levels similar to those calculated for Locations Ea, Eb and Ec (see EIR Table IV.F.4, p. IV.258). Thus, the prediction model indicates that the location of the stage and speakers would have a substantial effect on concert noise levels at the Steamboat Point Apartments, as well as in South Beach Park (Location Hb).

The concert noise analysis has not included any factors for directivity of the sound reproduction source (that is, speakers that direct sound to particular locations rather than broadcasting widely). In practice, directivity of speaker horns has a large effect on concert noise levels, and directivity can be employed to reduce sound levels coming from the concert site. Local, highly directional, delayed speakers, might be used in the stadium seating area to "enhance" the sound and allow lesser sound power to be used for the main speakers in the lawn area, similar to those used at the Concord Pavilion in the East Bay. These and other similar features would be considered by appropriate sound experts in implementing the concert noise mitigation measure discribed. See responses above under General Concert Noise.

Concert Noise In South of Channel Area (Mission Bay South)

Comments

The DEIR lacks completeness in that it does not examine the impacts South of the Channel:...Noise impacts to this neighborhood are not addressed. Noise limits on events

other than the five major events and ball games are not addressed. (Philip De Andrade, delegate of Mission Creek Harbor Association)

There are no crowd noise analyses test locations within Mission Bay north or Mission Bay south. (Corrine Woods, Bay View Boat Club, Mission Bay Citizens Advisory Committee)

In addition to direct traffic and parking impacts, the effects of noise...should be specifically addressed for the waterfront area, and appropriate mitigation measures that do not inordinately burden existing users must be included and funded in the project plan. (Comment from petition attached to letters by John H. Super, Commodore, Bay View Boat Club, and to letter by Betty A. Boatright)

Response

Noise impacts in Mission Bay North were analyzed in the Draft EIR for Location G, at Fourth and Berry Streets, where a multi-unit residential building is included in the most recent proposal by Catellus Development Corporation. The results of concert and ballgame crowd analyses for this site are summarized in Tables IV.F.3, IV.F.4 and IV.F.5 and the text on pp. IV.251 - IV.260 in the EIR.

Additional noise analyses have been prepared for two representative locations in the Mission Bay area south of China Basin Channel. These locations are near Third/Fourth Streets, at approximately the location of the hotel proposed in the Mission Bay Plan (Location I, about 1,750 ft. from the center of the ballpark), and on Terry A. Francois Boulevard near Mission Rock Street, where housing uses could be included in proposed revisions to the Mission Bay Plan (Location J, about 2,300 ft. from the center of the ballpark). These locations are shown on a revised Figure IV.F.2, presented above in Concert Noise In South Beach Marina Area. Noise projections were made for ground level and an upper level floor (about the 5th story) of a potential building at each location. There are no sensitive receptors at or near these locations at this time, and specific proposals or plans for development have not yet been presented; however, applications could be presented to the Planning Department in the near future. Therefore, these additional analyses are presented in the Responses to Comments on the Draft EIR. The proposed boat launch ramp at Pier 52 and restaurants along the waterfront on Terry A. Francois Boulevard south of Mission Rock Street would experience

less noise than described here, because they are located at greater distances from the proposed ballpark.

Projections of noise at Locations Ia through Jb indicate that large venue music events would increase total hourly L_{eq} noise levels by 7 to 12 dBA. Existing noise levels at these locations were measured for 48 hours during early May, 1997. At Location I, between Third and Fourth Streets, the existing hourly L_{eq} is about 63 dBA, primarily due to traffic on both streets. At Location J, near Terry Francois Boulevard, the ambient hourly L_{eq} is about 60 dBA. Music plus crowd noise from a large concert event would increase exterior L_{eq} at Location I to about 70 dBA at the ground floor and about 75 dBA at the upper level, increases of 7 to 12 decibels above the ambient levels. Location J is somewhat further from the ballpark site and would experience exterior noise levels of about 68 to 72 dBA L_{eq} during large concerts, increases of 8 to 12 decibels above existing levels.

Maximum music levels at large concerts, occurring about 1% of the time, e.g., with music crescendos, would range from about 72 dBA at Location J (Terry A. Francois Blvd.) to 81 dBA outside upper stories of Location I (near Third and Fourth Streets). Music at these maximum levels would be distinctly audible above the background.

The following additional information has been provided in Table IV.F.4, p. IV.258 to summarize the above analysis results:

		Project Music Noise Level (dBA)		Music Plus Crowd Noise (dBA)		Total Noise (dBA)	
Location	Existing Weekend or Evening Hourly L_{eq}	Hourly L_{eq}	Max Level	Hourly L_{eq}	Max Level	Hourly L_{eq}	Change in Hourly L_{eq}
Ia [4,8] Mission Bay South	63	69	75	69	75	70	7
Ib [4] between 3rd and 4th Streets	63	75	81	75	81	75	12
Ja [4] Mission Bay South	60	66	72	67	74	68	8
Jb [4] Terry Francis Blvd.	60	71	77	71	78	72	12

A new note 8 has been added to the Table IV.F.4, as follows:

> **8. Location H, in South Beach Park and Marina, is discussed in the text but has not been included in the table.**

Projections of noise at Locations I and J indicate that small music events would increase total hourly L_{eq} noise levels by 0 to 1 dBA, a small change. Music at maximum sound level would likely remain perceptible, because the maximum level would be comparable with the existing L_{eq} of 60 to 63 dBA, and because of the nature of music sounds, but as with other locations, small concert events would not cause significant noise impacts. The maximum levels would occur infrequently, probably much less frequently than the passage of an automobile or truck along Third Street. The results of the analysis have not been added to Table IV.F.5, as they are similar to the information provided for other nearby locations.

The following new text has been added on p. IV.261 before the last sentence in the first partial paragraph on the page:

> **At locations across the China Basin Channel from the ballpark, in the Mission Bay planning area at sites where existing or planned new buildings would not block sound, noise increases of 0 to 1 dBA could occur, similar to those shown for Location F.**

Implementation of a 90 dBA noise limit at the ballpark rim (including the top of the scoreboard) would reduce the music noise L_{eq} to 52 to 61 dBA and total noise levels to 64-65 dBA L_{eq} at Location I (1st to 5th floors) and 63-64 dBA L_{eq} at Location J (1st to 5th floors). The projected music and crowd noise levels tend to increase with elevation. At the 5th floor, the projected levels are roughly 5 decibels higher than at the ground floor. A revised mitigation measure to limit live amplified music noise levels at representative receptors in the ballpark area has been added (see above). This measure would reduce music noise to less than significant impacts or the South-of-Channel locations studied.

Projections of crowd noise at Locations Ia through Jb indicate that crowd noise from ball games would increase total noise levels by 3 decibels at Location Jb (near Terry A. Francois Boulevard), at about the sixth floor (20 meters or about 65 ft. above ground) and by lesser levels at Location I and at the ground-floor level of Location J.

The houseboat docking area is at roughly similar distance from the ballpark as Location G between King and Berry (Mission Bay North), but is shielded by the large building at the north side of the China Basin Channel. Projected levels of ball game crowd noise are 44 dBA L_{eq} and 55 dBA maximum level. Large concert noise levels are expected to be 51 dBA L_{eq} and 57 dBA maximum. Small venue concert noise levels are expected to be 42 dBA L_{eq} and 52 dBA maximum. The background community noise was not measured, but is expected to be on the order of 55 dBA L_{eq}. Further, community noise levels would be expected to rise as future development of the area south of the Channel occurs. Ballpark noise would be expected to be perceptible, but not materially affect the existing noise environment at this location.

Noise limits on smaller events have not been suggested in the EIR noise mitigation section because the analysis of smaller events shows that noise level increases would be 3 decibels or less, and therefore would not be considered to be a substantial intrusion or a significant environmental impact.

Table IV.F.4, including corrections noted in this and previous responses is presented below for clarity.

TABLE IV.F.4
PROJECTED CONCERT NOISE LEVELS
FOR FULL CAPACITY, OPEN-AIR EVENTS

	Location[3]	Existing Weekend or Evening Hourly L_{eq}	Project Music[1] Noise Level (dBA) Hourly L_{eq}	Project Music[1] Noise Level (dBA) Max Level	Music Plus[1] Crowd Noise (dBA) Hourly L_{eq}	Music Plus[1] Crowd Noise (dBA) Max Level	Total Noise[2] (dBA) Hourly L_{eq}	Total Noise[2] (dBA) Change in Hourly L_{eq}
A	Potrero Hill, Residential at Texas & 19th Streets	55	47	53	47	54	56	1
B	Townsend & Clyde, San Francisco RV Park	66	54	60	55	63	66	0
Ca[4]	**Townsend & Colin P. Kelly Jr. Streets, South Beach Marina Apartments**	62	61	67	62	68	65	3
Cc[4]		**57**	**63**	**69**	**64**	**72**	**65**	**8**
D	North of South Beach Marina Apartments	57	51	57	52	59	58	1
Ea[4]	Apartments North of King Street and East of Colin P. Kelly Jr. Street (ground, mid-, and top levels)	65	59	65	60	69	66	1
Eb[4]		65	60	66	62	70	67	2
Ec[4]		65	60	66	63	71	67	2
Fa[4]	Proposed Apartments North of King Street and East of 2nd Street (ground, mid-, and top levels)	65[5]	64	70	64	71	68[6]	3[7]
Fb[4]		63[5]	64	70	64	71	67[6]	4[7]
Fc[4]		60[5]	64	70	65	74	**67[6]**	**7[7]**
Ga[4]	Proposed Apartments between King and Berry Streets East of 4th Street (ground, mid-, and top levels)	62[5]	53	59	54	61	63[6]	1[7]
Gb[4]		60[5]	53	59	54	61	61[6]	1[7]
Gc[4]		57[5]	53	59	54	63	59[6]	2[7]
Ia[4,8]	**Mission Bay South between 3rd and 4th Streets**	**63**	**69**	**75**	**69**	**75**	**70**	**7**
Ib[4]		**63**	**75**	**81**	**75**	**81**	**75**	**12**
Ja[4]	**Mission Bay South Terry Francis Blvd.**	**60**	**66**	**72**	**67**	**74**	**68**	**8**
Jb[4]		**60**	**71**	**77**	**71**	**78**	**72**	**12**
La[4]	**South Edge Steamboat Pt. Apts, King St. Side**	**65**	**77**	**83**	**77**	**83**	**77**	**12**
Lb[4]		**65**	**82**	**88**	**82**	**88**	**82**	**17**

Notes:

1. "Project Music Noise" and "Music plus Crowd Noise" calculate noise from concert music alone and for noise from music and the audience alone, without regard to any surrounding noise sources. "Maximum Level" is the maximum cheer or applause.
2. Total noise adds music L_{eq} plus crowd noise L_{eq} to existing ambient noise. Note that dB cannot be added together using conventional arithmetic.
3. See Figure IV.F.2, p. IV.253 for a map of locations.
4. "a" is approximately ground floor, "b" is mid-level, and "c" is top floors of each multi-unit residential building.
5. Estimated existing ambient noise levels.
6. Sum of project and estimated existing ambient noise energy.
7. Relative to estimated existing ambient noise level.
8. **Location H, in South Beach Park and Marina, is discussed in the text but has not been included in the table.**

Source: Wilson, Ihrig & Associates, Inc., *San Francisco Pacific Bell Park at China Basin Acoustical Analysis of Impacts from Stadium Noise*, February 1997.

Noise Mitigation

Comments

An alternative, of course, is prohibition of large venue rock concerts and a 90 dBA limit at the Ballpark Rim for small venue concerts...

...To permit nearby residents to sleep, it is recommended that large venue rock concerts be prohibited or that a limit of 90 dBA at the Ballpark Rim be established and that rock concerts end no later than 11:00 PM, although 10:00 PM would be preferable in order to allow for the noisy departure of attendees. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

We also think very much that the mitigation for that [concert noise] should be identified as requiring the Giants to seek separate permits any time those things happen, and that there be neighborhood representation on the kind of review body that would look at those because they can be a real problem. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

Suggested Mitigation: Any non-baseball full ballpark open air event that anticipates significant and potentially neighborhood impacting sound levels must be subject to a separate city permit involving a public hearing and at least 90 day advance mailed notice to all owners and tenants of parcels within 300 ft. of the ballpark, and mailed notice to all neighborhood and business associations requesting advance notice. Prior to granting such permit, factors to be considered should include duration of the proposed event, start and end times, day of week, proximity in time to other noise generating events, prior experience with similar events, and consideration of other major concurrent events in the city (such as local conventions)...

..Tented events within the stadium which are not open air will be allowed to a maximum of 15,000 seating capacity provided ambient decibel levels are not exceeded in the nearby apartments in the neighborhood. (Martin Fay, Rincon Point - South Beach CAC)

Page V.62, Canopy Events: Establish a maximum dBA level for events in the proposed canopy so that there is no noise intrusion into the neighborhood associated with these events. (Steven L. Vettel, Residential Properties Group)

The CAC believes that the authors of the DEIR should re-evaluate this portion of the ballpark usage plan, properly re-categorize it as a significant impact, and develop a mitigation plan for this usage. The mitigation plan should include--at the minimum--the establishment of a procedure whereby the project sponsors were required to seek a separate permit for each and every one of such events, and that a standing committee be established including the Giants, the appropriate City agencies, and neighborhood representatives, to comment on the appropriateness of each such event. (Rick Mariano)

Concerning noise, I would hope that stringent limits on loudness and lateness would be placed on non-baseball events. The history of the Shoreline Amphitheater and its unhappy neighbors should give one pause here. There should be a definitive cap on the number of events allowed. And is it 5 major events (EIR, Vol. I) or 12 (EIR, Vol. II, p. A9)? (Arthur L. Meader, III)

Tented events within the stadium which are not open air will be allowed to a maximum of 12,000 seating capacity provided certain decibel levels are not exceeded in the nearby apartments in the neighborhood (see also sound consultant's report). (Michael Karasik, Bayside Village Associates)

Response

Several mitigation measures are suggested by comments on the Draft EIR, ranging from requiring permits for individual events other than baseball games to prohibiting large concert events. Requiring a separate permit for each special event at the ballpark would not, in itself, mitigate any physical noise impacts from events that were permitted, nor would neighborhood representation on any citizens' committee that might be formed to work with the City on ballpark activities. A revised concert noise mitigation measure has been added to the noise mitigation section (see the third Response under General Concert Noise, above). See also the discussion and improvement measures in Responses in Mitigation, Neighborhood Protection Plan, related to neighborhood effects, where special authorization for major non-baseball events is discussed.

Sleep-related concert noise effects would be reduced if concerts were required to end at 11:00 p.m., as suggested by comments. Unregulated major concerts with live, amplified music would be limited to five or fewer per year; others would be mitigated as noted above. Therefore, any sleep-related effects would not be considered to be significant impacts. Decision-makers could consider such a requirement in their deliberations on whether to approve the project and on appropriate conditions to impose.

Ballgame Crowd Noise

Comments

[The specific area plan assumptions that the DEIR must analyze must include]...a plan that provides standards to ensure that impacts caused by fan noise...are appropriately acknowledged and addressed by the specific project sponsor and the city agencies. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Specific "Area Plan Assumptions" the DEIR must analyze, include... A plan that provides standards to ensure that impacts caused by fan noise... are appropriately acknowledged and addressed by specific project sponsor and city agency commitments. (Martin Fay, Rincon Point – South Beach CAC)

Response

The EIR provides a detailed analysis of crowd noise from baseball games or other large events in the ballpark. A description of the methodology used for this analysis can be found on pages IV.239 - IV.242 of the EIR. Analysis results are summarized on pp. IV.251 - IV.256. This analysis is supported by a background report cited in the Impacts section notes (see, e.g., note 2 on p. IV.263). As is shown in Table IV.F.3, p. IV.252, crowd noise from a sellout ballgame would not cause an increase in the average hourly ambient noise levels (L_{eq}) at most locations studied, and would cause the hourly L_{eq} to increase by about three or four decibels at the upper levels of high rise apartment buildings near the ballpark site. Because crowd noise is a different sound from the traffic noise that characterizes the local ambient noise level in much of the project area, crowd noise would be noticeable from many outdoor locations near the ballpark, as noted on p. IV.255.

The EIR concludes that because of the limited duration and frequency of ballgame and other large-crowd events at the ballpark (see discussion of the number of non-ballgame events in Project Description, Uses of the Ballpark), and because of the urban setting of the ballpark, crowd noise would not be considered a significant impact. Therefore, no mitigation measures are warranted.

Comment

We know, for instance, -- the EIR even says it -- that the attendance at these events could be --because they can seat people down in the ball field -- 25 percent more than a full house baseball game. We know also the people who come to these concerts will not be the same -- won't have the same practice at it as the people who come to ball games over and over and know where to park and know how to walk and that sort of stuff. Many times it will be people coming for the first time. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

Response

The impact of a full house at large concerts has been accounted for in the noise analysis. An increase from 42,000 fans to 50,000 fans (assuming similar distribution in the stadium) would generate a noise increase of less than 1 dBA relative to crowd noise for 42,000 fans. Because the additional attendees would be located on the playing field, the net change in noise level due to crowd noise in the stadium would be less than 1/2 decibel.

Aviation Noise

Comments

Page IV.242, Aviation noise: The fact the Wilson Ihrig did their 3Com Park noise measurements during a night game when there were no aircraft trailing advertising banners is not an appropriate reason not to analysis this potentially significant environmental impact.

Page IV.256, Aviation noise: Aircraft overflights 81 days a year that "would be annoying to some" should be considered a significant environmental impact, since it would violate the San Francisco Noise Ordinance (see page III.113) (Steven L. Vettel, Residential Properties Group)

Measured sound levels of propeller-driven aircraft with trailing advertising banners are not provided in the EIR. However, the letter of March 4, 1997 to Barbara Sahm from James Nelson of WIA[1] contains data which permit reasonable estimates of aircraft noise levels at apartments near the Giants Ballpark. These data and the estimates are described below.

At Coors Field, the noise measurements were at a distance of about 1,200 ft. from the field. When the aircraft operated, noise levels on average increased about 2.8 dBA in several L_n's. This means that the aircraft's contribution to the total noise level was about equal to that from Coors Field (crowd noise, PA system, etc.) without the aircraft. On page 2 of the letter, WIA suggests that the ambient L_{eq} was about 59 to 60 dBA. For present purposes, I assume ambient at 60 dBA and, for simplicity, a noise level increase of 3 dBA— rather than

2.8 dBA— when aircraft operate. Thus, at 1,200 ft., aircraft noise levels were also about 60 dBA, L_{eq}. This estimated level is near that (a maximum of 61 dBA) reported at San Francisco 3-Com Park from an undefined but propeller-driven aircraft at some unknown distance.

The apartments at Giants Park are nearer than 1,200 ft. and, as a result, the noise levels due to aircraft should be higher. At a distance of 900 ft. at Location #3 — the South Beach Marina and Steamboat Point Apartments — aircraft noise levels are expected to be about 2.5 dBA higher than 60 dBA. At Location #6, or about 600 ft. from Park center, noise levels 6 dBA higher than 60 dBA are expected.

Aircraft are not stationary and, at times, noise levels may be higher than the L_{eq} 's described above. The maximum noise levels are estimated from data provided by Crocker[2], who provides a range of 1/3 octave band spectra from propeller-driven aircraft. In this case, the A-weighted level of Crocker's "typical operation" spectrum was subtracted from the highest A-weighted spectrum and this difference was added to the L_{eq} noise levels deduced as described in the preceding paragraph.

The results of these calculations are shown in Table 1, in which ambient noise levels with baseball crowds are also provided. Levels when spectators are relatively quiet are expected to be about 3 dBA less than shown in Table 1. It will be seen that average (L_{eq}) aircraft noise levels at the two locations exceed those of the crowds and that the maximum noise levels are well above crowd noise levels. It should also be noted that the estimated maximum noise levels are similar to those reported at Coors Field "approximately 15 dB over ambient" (Acoustical Analysis, Appendix S-1, page 24).

Table 1 [from Lukas comment]
Estimated Noise Levels at Two Locations
from Aircraft Towing Advertising Banners

Apartment Location	Distance from Park Center	Flight L_{eq}	Flight Maximum	Crowd* L_{eq}
#3, South Beach Marina and Steamboat Point Apartments	900 feet	62.5 dBA	75.5 dBA	62 dBA
#6, north of King, east of Second Street — apartment under construction	600	66.0	79.0	63-65

* With baseball crowd noise, from DEIR Table 8.1

The average estimated noise levels from propeller-driven aircraft trailing advertisements are expected to be as loud as or about 3 dBA louder than crowd noise-controlled ambient at some locations, but aircraft maximum noise levels will be well above crowd noise. The

number of flights which may occur during baseball games, their durations, flight paths, type of aircraft, etc. have not been defined, so it is difficult to estimate hourly nose levels and to compare these levels vis a vis the criterion (page 27, paragraph 6.2). However, aircraft noise is distinctive and, as described in the EIR, "an irritating source of noise" (page 24) or, in general, an added nuisance in an already noisy and controversial situation...

...There may also be questions of safety associated with such aircraft flying near or over residential areas. Because the estimated noise levels of these distinctive flights are expected to be at or to exceed baseball crowd noise and the estimated maximum noise levels will be well above crowd noise, we recommend a prohibition of flights over Giants Park. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

1. Letter, James T. Nelson to Barbara Sahm. Subject: Local general aviation aircraft noise, San Francisco Giants, Pacific Bell Ballpark environmental analysis, March 4, 1997.

2. Malcolm J. Crocker, "Noise of Air Transportation to Nontravelers" in Daryl N. May, Ed., *Handbook of Noise Assessment*, New York: Van Nostrand Reinhold Co., 1978, pg. 96, fig. 3-11.

Aircraft noise was not addressed. We need to address how aircraft noise is going to affect all of the people living in this area. This is what they call home. (Richard Dickerson, South Beach Marina Apartments)

Page V.62, Aviation Noise: Aircraft towing advertising banners should be prohibited over the ballpark and the on-shore residential neighborhood. (Steven L. Vettel, Residential Properties Group)

Aviation noise directly associated with the ballpark is not analyzed, only commented on. (Martin Fay, Rincon Point – South Beach CAC)

No mention of fly over advertising during events. (Michael Karasik, Bayside Village Associates)

Impact on the South Beach marina, including...aircraft...must be considered and minimized. (Abigail A. Grafton, M.A., M.F.C.C.)

Response

General aviation operations over the new ballpark would not be a part of the project. As stated on p. IV.242 of the EIR, and in endnote 8 on p. IV.263, general aviation noise from the operation of small aircraft towing advertising banners and noise from large commercial aircraft overflights, although discussed in the EIR, were not included in the model developed for the Noise analysis done for the EIR. Large commercial aircraft overflight noise was

excluded because it is not related to activities at the existing or proposed ballpark, and would continue irrespective of construction of the proposed ballpark.

The San Francisco Noise Ordinance does not address noise from advertising planes, and such noise is considered to be of intermittent character. The San Francisco Giants organization would have no direct control over whether, where, and when general aviation aircraft of any type fly. Increases in general aviation operations are thus not a part of the project, but could be a result of project implementation.

Discussions with air traffic control personnel at the Oakland and San Francisco Federal Aviation Administration (FAA) towers revealed that the number of banner-tows, advertising blimp, and light-aircraft excursion flights over the Bay Area have more than doubled in the last few years. It is not know whether a corresponding increase has occurred in advertising planes flying over baseball stadiums or whether the increase has occurred as adverting planes fly over other outdoor events such as the Bay-to-Breakers run in San Francisco. Unless these flights come within the FAA "safety zones" established around airports, they are not controlled by the FAA and are only required to file flight plans. Flights over 3Com Park are controlled by the FAA because they are within the safety zone of San Francisco International Airport. Similarly, flights over the Oakland Coliseum are controlled because they are within the safety zone of Oakland International Airport. In an unusual situation during the 1985 Superbowl, played at Stanford Stadium in Palo Alto, the FAA took control of air traffic over the stadium, which is not in a safety zone, because the large number of advertisers wanting overflights could have created a temporary air traffic safety hazard. This situation is not expected to occur on a regular basis at the proposed ballpark, although it could occur during a World Series. According to an FAA representative, the FAA is monitoring flight activity in the China Basin area in anticipation of an increase when the ballpark is completed.[28]

As stated on p. IV.242 of the EIR, general aviation noise is considered by some people to be an annoying noise source. The trend toward more general aviation noise in the Bay area is

28. Chuck Weinum, FAA Oakland, telephone conversation with EIP Associates, May 7, 1997.

expected to continue, and temporary concentrations of banner-tows and other advertising overflights are expected to continue to occur where large crowds are anticipated, such as at the proposed ballpark. Unless the air traffic over the ballpark threatens to become dangerously congested, it is not anticipated that the FAA would limit overflights.

In the absence of measured data at a San Francisco Giants ballgame, data obtained at Coors Field in Denver, Colorado was used to characterize the noise levels at the project due to small planes that might frequent the area during a game.[29]

Aircraft noise may dominate the noise environment at times during a ballgame. However, general aviation aircraft towing banners are not continuous events, and may involve only a few passes during a game. For example, during measurements of ballpark noise at 3Com Park (Candlestick Park) for the present study, only one small aircraft was observed (not towing a banner), and only for a minute or so, in contrast to the observations made in the Coors Field report. As the commenter has observed, the measurements at 3Com Park were taken at a night game, which may not be representative of daytime operations. Observations at other ball games indicate a few flyovers at about mid-game by aircraft towing banners.[30] These observations would suggest that general aviation aircraft would not necessarily alter projected community noise levels although the industrial fly noise would be noticed. However, current trends in aviation advertisement suggest that aircraft towing banners could become more numerous, and there is a possibility that aircraft banner advertising of the same magnitude as that existing at Coors Field could occur at the proposed park.

One commentor suggests that aircraft noise would increase the L_{eq} by about 3 dBA relative to noise levels with ballpark activities without aircraft. However, the data provided in the Coors Field report, as well as analysis for the EIR, indicate that the noise increase at distances up to about 1,200 ft. from the ballpark with both aircraft and ballpark noise present

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29. *Community Noise Monitoring Program, Coors Field*, Prepared for Denver Metropolitan Major League Baseball Stadium District, Helmuth, Obata, & Kassabaum, Inc., August 11, 1995.

30. Observations by the staff of Wilson, Ihrig & Associates, Inc., various ballgames in Bay Area.

was about 2.7 to 2.8 dBA relative to ambient noise without any ballpark activities occurring. The 60 dBA L_{eq} assumption used in the EIR discussion (based on the letter dated 4 March 1997 cited in the EIR at note 13, p. IV.263) is for ambient noise without ballgame activities. That is, the estimated ambient noise level for aircraft noise alone would be about 60 dBA L_{eq}, which might increase estimates of total environmental noise by about 3 dBA in some locations, when aircraft were in use.

The commentor suggests that aircraft noise would increase with decreasing distance between the ballpark and receiver. The Coors Field report does not discuss the flight paths of banner towing aircraft, but one may expect that such flight paths are circular or oval in nature, with turning radii on the order of 1,000 ft. or possibly more. Further, flight paths would pass directly over the ballpark from time to time so that fans could see towed banner advertisements. Under these circumstances, no upward adjustment should be added to aircraft noise estimates for apartment buildings located closer to the proposed ballpark than 1,200 ft., because at both Coors Field and the San Francisco Giants Ballpark, aircraft would fly beyond the stadium structure so that measurements taken at a distance of 1200 ft. would capture the same street overflight as a measurement taken at 900 ft.

The commentor indicates that aviation noise from aircraft towing banners would be on the order of 75 dBA maximum. The Coors Field report indicates that aircraft noise levels were as much as 15 decibels over the "ambient" level. If we assume that the background level during a ballgame is about 60 dBA, as suggested by the Coors Field report data, the maximum sound level produced by aircraft could be as high as 75 dBA, roughly similar to that indicated by the commentor for distances of 1200 ft. from the stadium. However, the Coors field report does not suggest that maximum noise levels for aircraft would be higher than 75 dBA at locations closer to the ballpark because of general aviation aircraft. Due to the variations in flight paths, as discussed above, this maximum level due to general aviation aircraft overflight would likely be reasonably uniform over the area within 1,200 ft. of the stadium.

Predicting maximum levels is very difficult due to flight path variations, as noted by the commentor. The limited data provided in the Coors Field report do not allow a precise estimate of aircraft noise, because the numbers of aircraft and overflight that might occur at the new San Francisco Giants Ballpark are not known, and because of the presence of a variety of other noise sources, including commercial jet aircraft. Therefore, the discussion in the EIR presents general information about plane noise but does not attempt to quantify an overall average hourly noise level increase.

As explained in the EIR (p. IV.256), small advertising planes would be in the area for relatively short periods during afternoon and early evening events, this noise would not be a significant effect.

The first sentence of the second paragraph on p. IV.256 of the EIR has been revised with text added at the end of the sentence:

> **Small planes towing advertising banners, similar to those that now fly over 3Com Park and other similar sites, would be an additional, new source of noise in the area of the ballpark during baseball games and other main events. The San Francisco Noise Ordinance does not address noise from advertising planes, and the project sponsor has no direct control over adverstising flights. Unless such flights impinge on an airport safety zone, or their concentration constitutes a temporary air traffic safety hazard, the Federal Aviation Administration control towers at San Francisco and Oakland Airports do not limit them.**

The last sentence of the second paragraph on p. IV.256 of the EIR has been revised as follows:

> **Because small planes would only be in the area for a few hours, and only before and during ballgames, the additional noise ~~would not be considered~~ is considered a temporary nuisance rather than a significant environmental impact.**

The following has been added to the end of the last paragraph on p. I.40 of the EIR:

> **Ballgames and other major events at the ballpark could attract small planes with advertising banners, similar to those that now fly over 3Com Park and other**

similar sites. The resultant noise is considered a temporary nuisance rather than a significant environmental impact.

Traffic Noise

Comments

Environmental Quality - While project specific impacts are analyzed, issues of...noise pollution from traffic, buses and crowds along travel corridors are not adequately dealt with, with respect to mitigation. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Impacts which have not been thoroughly enough studied, documented and for which adequate mitigation has not been developed include:...confining effects of intense human activity, including noise ...to the stadium site, and preventing these activities from adversely affecting the waterfront and bay fisheries. (Dave Mochel, Penguin Boat Co.)

With regards to noise issues in the environmental impact report, noise issues from automobiles was not addressed adequately in that they said there was no significant impact. Well, it is one thing when cars are whizzing through the area. It is another when they are sitting there with their radios playing and people are talking and windows are open, waiting in line to go places, which is what the traffic impacts show will happen in this area. That will have a noise impact on us. (Richard Dickerson, South Beach Marina Apartments)

Page IV.245: The analysis fails to distinguish between general traffic noise and the particular types of noise associated with fans arriving or leaving a sports event in slow, backed-up traffic. Horns, radios, whooping, and other noise caused by fans inside their cars (with car windows open) could be significant adjacent to residences and must be analyzed.

Page IV.256, Pedestrian noise: The analysis of the noise impacts on the South Beach residential neighborhood of pedestrians traveling through the neighborhood before and after ballpark events is completely inadequate. This is a crucial area of analysis because pedestrian routes between the ballpark and both downtown and parking north and northeast of the ballpark would pass through the neighborhood, sometimes late at night. An adequate analysis is also necessary so that appropriate pedestrian routes through the neighborhood can be designated as a mitigation measure to address these impacts.

Pedestrian noise by fans of rock concerts could be qualitatively and quantitatively different than baseball fans. The EIR must analyze this potentially significant impact...

...Page V.62, Pedestrian Noise: Designated pedestrian routes must be established to route ballpark patrons away from the residential sidewalks in South Beach. Second Street and the Herb Caen Promenade are appropriate pedestrian routes that skirt the residential areas. (Steven L. Vettel, Residential Properties Group)

IV.334 - noise from nighttime activity: While the noise from activities such as bars may be less than the noise from the ballpark, it may be much more obnoxious. First, it will go on later into the night, when more people are expecting to be able to sleep. It may be closer to people's residences and more "open"— not contained in the ballpark. A particular problem is people walking to their cars, yelling to each other, revving their engines and generally having a good, sometimes drunk, time. It can also be more random and episodic, rather than a consistent hum of background noise. The irregularity of such noise, and not being able to anticipate it, is even more disruptive. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

noise... [are] nowhere analyzed...[T] Other issues of concern [to the South Beach area] includ[e]... pedestrians there is no quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel)

Response

The effects of project-induced traffic noise on noise-sensitive land uses in the project site vicinity are the subject of detailed consideration in the EIR (see Traffic Noise Impacts discussion, beginning p. IV.245, and the results of the traffic noise modeling, as presented in Tables IV.F.1 and IV.F.2, pp. IV.246 and IV.249). No significant project traffic noise impacts were identified.

Potential noise impacts from crowds of fans leaving the ballpark after a night game were identified in the EIR (see p. IV.256, first paragraph). The latter would be confined to the immediate vicinity of the ballpark for approximately one-half hour following a night game. At places farther from the ballpark, noise from dispersing fans, either on foot or in vehicles, would be secondary to that from cumulative local traffic.

The volume, duration and type of noise from the crowds would vary depending on many factors such as the size of the groups of fans/concert-goers, the particular visiting baseball team, the type of concert at the ballpark, etc. As fan/concert-goer traffic approached or left the dedicated parking lot the ballpark, the particular noise generation characteristics that distinguish it from other traffic might become more apparent. Thus, groups of fans traveling in different cars may start calling to each other, blow their horns more frequently, turn their radio volumes higher, etc. It is not possible to quantify the level of noise this type of activity might create, if it were to occur. The pedestrian-related and traffic-related nightime

noise after ballgames and events would be annoying to some local residents but would not cause long term increases in ambient noise levels and would occur about 40-50 times per year or less often. Therefore it would not be considered to be a significant environmental impact.

Comment

I believe the majority of voters on Potrero Hill voted against Proposition B (which approved a privately funded stadium) not because they are against a new stadium or do not like baseball, but because they knew that it would be exceedingly difficult to build such a stadium in China Basin without severely affecting the neighborhoods surrounding this area and the greater San Francisco area as well. A thorough reading of the Draft EIR has proven these fears to be well founded. Not only is Potrero Hill excluded, or mentioned with the intent of exclusion, in many key sections of the Draft EIR, but many of the conclusions drawn in the Draft EIR are clearly illogical and misguided. The most significant of these conclusions concern:...

- Noise,... (Sarah Ames)

Impact on the South Beach marina, including...noise...must be considered and minimized. (Abigail A. Grafton, M.A., M.F.C.C.)

Response

The EIR contains extensive analysis of project traffic and crowd/concert noise impacts throughout the project site vicinity, including at receptors in the Potrero Hill community and the South Beach area. Traffic noise levels were calculated at a residential use and a church along Mariposa Street (see Tables IV.F.1 and IV.F.2, pp. IV.246 and 249) and crowd/concert noise levels were calculated at a residential use at Texas and 19th Streets (see Tables IV.F.3 through IV.F.5, pp. IV.252, IV.258, and IV.260). Traffic and crowd/concert noise levels were also analyzed at the Steamboat Point Apartments, across The Embarcadero and King Street from the Marina. All sites analyzed show relatively small noise increases (2 dBA or less) due to traffic from the project plus cumulative growth except at the church site on Potrero Hill, where cumulative and project traffic is expected to cause a noise increase of about 5.5 dBA during the hours before and after ballgames or other major events.

Additional information about concert noise has been prepared in response to comments raising concerns about the effects of large concerts on the South Beach harbor area and the area south of China Basin Channel (see Concert Noise, above).

Comment

The EIR discusses in quite some detail, the effect of hi-mast, high intensity light glare against a black night-time ambient background but does not adequately address noise intrusion into a relatively low ambient night-time noise level. Just as with glare, it is the suddenness and contrast that will annoy (not equivalent weighted daily averages). I think that a night-time ambient of 65 dBA, even in the City, is unrealistic. While the ambient level may never approach suburbia's 45 dBA, it certainly will be closer to 55 dBA. (Silva B. Creg)

Response

The existing ambient evening or weekend noise levels at some receptors in the vicinity of the proposed ballpark were obtained from direct measurements taken for five to seven consecutive days at those locations. The receptor locations where the evening or weekend noise level is shown to be 60 to 65 dBA rather than the 55 dBA levels more common in lower-density residential areas, are in the high-density South Beach neighborhood at sites such as the Steamboat Point Apartments and a proposed residential use west of the ballpark site. These sites are exposed to traffic noise from major local streets such as Third, Second, King and Townsend Streets, and The Embarcadero and therefore have louder ambient noise levels than most sites on Potrero Hill and other residential areas experiencing mainly local traffic. The stated noise levels shown in Table III.F.2., p. III.119, are reasonable for dense urban areas with high traffic volumes.

Construction Noise

Comment

Page IV.261 Construction Noise, 1st sentence, indicates project will take about 18 to 24 months. This is in conflict with p. IV.228, which indicates 27 months, assuming 4.5 months of overlap of the four major construction phases. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

Response

The 27-month construction time provided in the Transportation and Circulation section on p. IV.228 is a correct estimate of the total duration of construction activities (excluding demolition, which is expected to take place during the summer/fall of 1997 as a separate activity). This estimate was used for assessing traffic-related effects on surrounding streets and sidewalks during construction. The 18- to 24-month construction period referred to in the construction noise discussion (p. IV.261) relates generally to outdoor construction activities that would generate exterior noise; interior finishing activities continue to generate automobile traffic from construction workers and truck traffic from delivery of materials but typically would not be noisy because construction equipment is inside the building shell. Because construction of the ballpark would have less interior finishing and more exterior work during the finishing phase as seats, railings and other spectator-related facilities would require outdoor construction activities, the text on p. IV.261 has been revised:

> **Project construction would take about ~~18-24~~ 24 to 27 months and would temporarily increase noise levels in surrounding areas.**

Comments

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: Noise due to demolition/construction. (Ship Clerks' Association, Local 34, ILWU)

Page IV.262, Pile Driving: Pile driving in a residential neighborhood for a period of 5 to 6 months must be considered a significant environmental impact...

...Page V.61: Pile driving hours of operation must be limited to weekdays from 8:00 a.m. to 5:00 p.m., the hours when most neighborhood residents are working. Multiple pile driving rigs should be employed to minimize the period during which piles are being driven. (Steven L. Vettel, Residential Properties Group)

Noise caused by pile driving will exceed 80-85 dBA. (DEIR IV.261). Acceptable levels for office space under Article 29 of the San Francisco Police Code are 70 dBA during the day. (DEIR III.113). Although this restriction is cited in the Environmental Setting section of the DEIR, the effect of the pile-driving noise on the adjacent CBL Office Buildings is not addressed at all in the analysis of the construction noise's impacts. The DEIR states that "the closest receptors are over 200 ft. from the perimeter of the ballpark site." (DEIR IV.262). The specific name and location of this receptor is not given...

...The Noise disturbance of the Pile-Driving and Steel Construction can be devastating to both neighboring residential and commercial uses. The DEIR and the proposed mitigation measure should not lose sight of the considerable day-time commercial population immediately in the vicinity of the Stadium. To mitigate the disturbance to the tenants of the adjacent CBL Office Buildings, the following mitigation measures should be considered: 1) construction of a temporary sound barrier at the eastern end of the CBL Office Buildings to mitigate the noise impacts of the pile-driving and steel construction; 2) limit the work to weekend hours as much as possible, and 3) extend the daily hours for pile-driving work to shorten the length of the days needed for the work. In determining the appropriate schedule for pile-driving the Department of Public Works (DPW) should be mindful of the work hours of the existing community tenants at the CBL Office Buildings. DPW should attempt to minimize the disruption to their workday as well as the negative environmental impact of the noise and vibration on occupants of this building. (David P. Cincotta, representing China Basin Landing, Ltd.)

How will the noxious effects of the construction site be dealt with? For example, noise...

...Limit pile driving to weekdays only. Pre drill pile holes. Start with 3-4 rigs at corners of the site, work toward the middle. Limit hours of pile driving to 8:30 a.m. to 4:30 p.m. on weekdays only. Limit firing up of pile driving rigs and construction related machines to these same hours. (Michael Karasik, Bayside Village Associates)

No information is given about the effect on the quiet enjoyment of the harbor tenants. During construction no pile driving should be allowed on Saturday or Sunday, the highest harbor use times. No exceptions can be justified. (Mark Miner)

Draft EIR authors should have defined as "part of the project," meaningful neighborhood representation on a "construction coordinating committee" that could regulate the over 1 million square foot, 3 year construction project being built in an already developed residential and commercial neighborhood. This report analyzes pile driving, for instance, that goes on for 5-6 months, up to 6 days per week, from the hours of 7:00 a.m. to 8:00 p.m. It "recommends," but does not "require" pre-drilling for piles. The early morning, evening and/or weekend pile-driving situation alone is unacceptable in a neighborhood where so many people live and work. (Rick Mariano)

p. IV.262 3rd paragraph, indicates pile driving for five or six months, occurring during weekdays and occasionally on weekends. Both the duration and hours of operation should be limited to minimize the impact to the surrounding community.

Recommendation G: Require the project to utilize a foundation system which can be installed without exceeding 75 DBA @ a distance of 200 ft. from the project, including impact noises. Require all work which causes impact noises to be limited to weekdays between 8:00 a.m. and 5:00 p.m.

Require the project to minimize the duration of operations which cause impact noises by utilizing the maximum number of crews and/or pieces of equipment that the site can accommodate without causing congestion and interference between crews and/or equipment. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

On pile driving, I would like the EIR to look at a couple of pile driver mitigation measures, which we will submit in writing, both four or five rigs operating at once to compress the pile driving schedule, as well as a sound proofing shroud that can go around the pile driving hammer. (Steve Vettel, Bay Side Village Associates)

There are several grave concerns and questions with respect to construction impacts... Impacts of Pile Driving and Construction must be mitigated by:

- Limiting pile driving to weekdays only
- Pre drill pile holes
- Limit hours of pile driving to 8:30 a.m. to 4:30 p.m. on weekdays only
- Limit firing up of pile driving rigs and construction related machines to these same hours (Martin Fay, Rincon Point – South Beach CAC)

Response

The EIR acknowledges that construction noise would be disruptive to the closest noise-sensitive land uses periodically over the course of ballpark construction (see Construction Noise impact discussion, beginning on p. IV.261).

Typical pile drivers can generate noise of about 100 dBA at 50 ft. This noise level would be higher if more than one pile driver were operating at the same time (two similar pile drivers operating simultaneously in close proximity to each other would produce a noise level of 103 dBA at 50 ft.). The same principle applies to using a maximum number of pieces of equipment on site. The duration of noise-causing construction activities would be less but the noise intensity during construction would be greater.

The potential for disruption in the project site vicinity is enhanced by the local land use mix, which contains both commercial and residential uses, the former being more sensitive to construction noise during the day, the latter at night and on weekends, therefore, any specific mitigation measures limiting pile driving to either only daytime hours or to only night or weekend hours would disturb one or the other group of area users. The pile driving noise mitigation measure included in the project calls for consultation with the Department of

Public Works in order to establish times that would cause the least disturbance to all users of the area (see EIR p. V.61).

The San Francisco Noise Ordinance provisions related to construction noise are not the same as restrictions on mechanical noise from operating buildings. As explained on p. III.112 and IV.262 of the EIR, construction noise is limited to 80 dBA at 100 ft. from construction equipment, but impact tools, such as pile drivers, are exempt from this restriction as long as mufflers are used (SF Police Code Article 29, Section 2907). Noise from fixed sources such as building mechanical equipment is regulated in Section 2909 of the Police Code; that section establishes a 70 dBA noise limit on mechanical equipment for sites located in commercial areas, but the limit does not apply to construction activities.

The EIR can not "require" pre-drilling pile holes or any other mitigation measure. The document is required to present reasonably feasible measures to reduce potentially significant physical environmental impacts, and to indicate whether the measures are included in the project. For pile driving noise, two measures are presented (pp. V.61 and V.62), one of which has been included by project sponsor as part of the project. Decision-makers, will need to consider whether or not to require implementation of all mitigation measures described in the EIR. Reasons for rejecting measures must be provided in the decision-makers' findings approving a project (CEQA Section 21081).

Comments

Pile driving is expected to be loud — more than 85 dBA — and "disturbing" (page IV.262). Use of noise barrier blankets on three sides of the pile drivers is recommended. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

P. V.62 1st paragraph suggests that the project be required to pre-drill holes for piles to minimize noise and vibration from pile driving, however this requirement should be expanded to provide effective noise control of impact noise due to pile driving. Also, the paragraph concludes that piles will be driven in five to eight minutes if pre-drilling is feasible, however, in the previous sentence the writer apparently does not have soils information sufficient to determine if pre-drilling is feasible. Without soils information, how can the author determine the time needed to drive each pile? Has the project driven indicator piles, and if so, how long did each pile require?

Recommendation H: Require the project to utilize a foundation system which does not create impact noise during installation, such as vibration-installed piling or caissons, so long as the added cost of such a system, as verified by a qualified independent construction cost estimator, does not increase the total direct construction cost by more than 3%.

Require the project to utilize a noise barrier which reduces noise from impact equipment such as pile driving hammers to less than 75DBA measured 200 ft. from the project.

Noise barrier shall meet the specific requirements of attached specification, titled Pile Driving, Noise Barrier, dated 10 April 1997. Noise barriers which meet this specification can be leased from Bravo Environmental Inc., Bakersfield, CA...

...Recommendation K: Require the project to utilize electric tower cranes instead of diesel powered cranes, to reduce noise during construction. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

There are several grave concerns and questions with respect to construction impacts... Standard construction mitigation measures for residential neighborhoods shall be employed by the construction team, including but not limited to... muffling of noise, etc. (Martin Fay, Rincon Point - South Beach CAC)

Standard construction mitigation measures for residential neighborhoods shall be employed by the construction team, irrespective of the Giants time constraints, including but not limited to dust control, muffling of noise, etc. See also the report of O'Brien Kreitzberg. (Michael Karasik, Bayside Village Associates)

A sound proofing shroud should be installed around each pile driving hammer. Such shrouds can achieve a 15 dBA mitigation and are available for rent from the manufacturer. See Comments of O'Brien Kreitzberg for details and specifications. (Steven L. Vettel, Residential Properties Group)

Response

Vibration-installed pile driving techniques reduce noise but usually substantially increase vibration impacts.

Unless the noise source were completely enclosed, the typical mitigative effect of barriers on most receptors impacted would be about 5 to 10 dBA. This reduction would only be gained if the barrier interrupted the direct propagation path (i.e., the straight line connecting source and receiver). In cases where the noise source were visible from the receptor location (e.g.

an upper story window overlooking the construction site), little or no drop-off in noise level would be realized from use of typical noise barriers.

The pile driving noise analysis was prepared for a conventional drop hammer pile driver. Quieter pile driving rigs have been available for over ten years that produce noise levels 10 to 15 decibels lower than a conventional rig.[31] Most of these use some kind of soundproofing shroud or casing. Therefore, the EIR presented a worst-case impact analysis. Use of a quieter pile driver could reduce noise at residential receptors to 75 dBA or less, although the impact of the pile driving hammers would still be quite noticeable. Pile driving activities are expected to occur for about five or six months of the construction period. Project sponsor has indicated that special, noise-controlled pile driving systems may be extremely expensive. Mitigation measures for pile driving noise are included in the Noise Mitigation section of the EIR (pp. V.61 - V.62). Project decision-makers could consider requiring the sponsor to use special pile driving equipment as a condition of approval.

Construction Noise Improvements

Comments

Specific "Area Plan Assumptions" the DEIR must analyze include... A plan that defines and mandate the practice of good neighbor policies by ballpark operators to insure the protection of neighborhood quality, livability and character...

...Good neighbor policies covering hours of operation, limited weekend operations and maximum duration are not defined with respect to pile driving and construction noise and traffic. Good neighbor policies and procedures for both construction and ongoing ballpark operations need to be defined and agreed to...

...There are several grave concerns and questions with respect to construction impacts... Establish a construction coordinating committee including neighborhood representatives to set up guidelines for construction methodology, and to meet with the project sponsor and their construction personnel on a regular basis and maintain regular communications. Agree to work in good faith to quickly resolve any problems that arise. (Martin Fay, Rincon Point - South Beach CAC)

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31. Gill, Harjodh S., "Control of Impact Pile Driving Noise and Study of Alternative Techniques," in *Noise Control Engineering Journal*, March/April 1983, p. 76.

Strict monitoring and fines can help control noise issues such as pile driving outside of permitted time schedules, but harbor tenants (and other citizens) must have a place/person to contact for such issues, perhaps some type of ombudsman with enforcement power. (Doug Gooding, CAC member)

Response

Construction noise other than pile driving is not considered to be a significant impact. The project sponsor could consider appointing a neighborhood construction coordinator, as described in Transportation, Construction Transportation. As noted above, the mix of land uses in the project area makes it difficult to establish a permitted time schedule for construction at this point. Coordination with DPW to establish appropriate times of the day and week for pile driving is included on p. V.61.

Comments

Lack of an analysis of PA system voice levels is acceptable because the 3-Com Park data indicate that PA system announcements outside 3-Com are roughly 3 dBA lower than cheering. (See page IV.20 and Figure IV.F.1 on page IV.241.) It is critical, however, that the PA system in Pac Bell Park have a controlled sound volume. That is, the system must be designed carefully in terms of the number, location, and direction of the loudspeakers and, most importantly, there must be a strict upper limit on the amplifier gain, or loudness, which is under the control of a PA operator. This limit should be established after the PA system is in place; the limit should be set after a test and demonstration that the PA system is inaudible at the nearest residences...

...Loudspeakers outside the Ballpark in the vending areas and parking lots should be prohibited because their acoustical outputs will directly affect nearby residential areas. (Jerome S. Lukas, Ph.D., Consultants in Engineering Acoustics)

Page II.14: Describe the public address system, its normal volume and its maximum amplification capacity at the edge of the ballpark. Will there be an organ or other musical instrument amplification?...

...Page IV.240, PA system noise: It is inappropriate to not include PA noise in the computer model of noise impacts. As Figure IV.F.1 shows, PA noise does produce noise peaks above the ambient level at times different than crowd cheering noise (indeed, the two will seldom coincide). It thus will be audible outside the ballpark (unless controlled), even if the peaks from crowd cheering may be louder on occasion than PA noise. PA noise should be analyzed in L1 terms, not L_{eq}, since it is not a constant source of noise, but sporadic. In the Wilson Ihrig Report (Appendix S-1), at page 31, crowd noise is analyzed using L1

measurements, and the report concludes it "would be very audible" at the South Beach Marina Apartments.

Does the analysis take into account PA special effects, such as trumpet blasts, organ crescendos, etc.?

Will there be any speakers outside the ballpark? If so, was the potential noise impacts of those speakers studied?

Page IV.240, Distributed speakers: The proposed distributed speaker system must be described in more detail. Can it be engineered in such a manner as to be inaudible outside the ballpark, perhaps by increasing the number of speakers?...

...Page V.62, Exterior Speakers: Prohibit exterior speakers. (Steven L. Vettel, Residential Properties Group)

Any loud speakers placed outside the stadium shall be regulated in decibel level so as not to disturb neighborhood residents. (Michael Karasik, Bayside Village Associates)

Response

The PA system at the ballpark is proposed to be a distributed, multi-speaker system, with a speaker in every section, similar to that now at 3Com Park. The system also would include speakers located at concession stands, in the restrooms and in the food court area, controlled by the main sound-system operator, not by individual concessionaires, so that persons waiting in line for merchandise or food could follow the game,[32] similar to the existing system at 3Com Park. It would not include speakers generally distributed around the concourse areas or broadcasting to the sidewalks or streets outside the ballpark, but may include speakers near the Port Walk so that those using the walkway adjacent to the water could also hear the game. These concourse and walkway speakers would not broadcast the game announcer's calls from the main PA system, but would provide the radio broadcast of the game.

32. Memorandum from Jack Wrightson, of Wrightson, Johnson, Haddon & Williams, to Sandy Eeds of HOK Sport, dated June 10, 1996, describing the proposed acoustics, broadcast, audio and video systems for Pacific Bell Park.

Measurements of crowd and PA system noise were made outside 3Com Park during a night game in April, 1996, to obtain base sound information for the EIR analysis. The results of these measurements are described on pp. IV.239 - IV.242 and shown on Figure IV.F.1, p. IV.241. The PA system at 3Com Park was only occasionally audible, and produces less sound energy on an hourly-averaged basis (L_{eq}) than the crowd noise. Because crowd noise dominates the overall ballpark sound, it was not necessary to separately evaluate and add PA system noise to the overall noise analysis for the new ballpark at China Basin.

No speaker system is being considered for the dedicated ballpark parking lots South of China Basin Channel.

Comment

Page V.62, Fireworks: Fireworks should be limited to Opening Day, Fourth of July and Play-off/World Series games. (Steven L. Vettel, Residential Properties Group)

Response

Fireworks are expected to occur at the new ballpark, most likely from a barge in the Bay. A permit would be required from either the San Francisco Fire Department or the U.S. Coast Guard or both, dependency or both, depending on the location. Decision-makers could consider limitations on the number of times fireworks are displayed at the ballpark as a condition of approval.

AIR QUALITY

General

Comments

The EIR says air quality is below the state standard. We are looking at long-term quality of life. (Nancy Anding)

The DEIR includes a statement on, I.41 that air pollutant emissions will be increased and exceed the BAAQMD threshold, but that this is not serious because vehicle emission controls will be more stringent before 2015. Vehicle emission controls are subject to legislative whim and have been repeatedly delayed. In addition other projects are being planned, i.e., Candlestick Mall, and there will [be] large cumulative impacts. The TMF [commenter's suggested Traffic Mitigation Fee, a parking surcharge] will be the best step to reduce driving and emissions. (Howard Strassner, Chair SF Group, Sierra Club)

With regard to air quality, it looks as if pollutant levels will exceed appropriate thresholds for some unknown but probably substantial time during the years 2000-2015. This does not sound acceptable. (Arthur L. Meader, III)

I believe the majority of voters on Potrero Hill voted against Proposition B (which approved a privately funded stadium) not because they are against a new stadium or do not like baseball, but because they knew that it would be exceedingly difficult to build such a stadium in China Basin without severely affecting the neighborhoods surrounding this area and the greater San Francisco area as well. A thorough reading of the Draft EIR has proven these fears to be well founded. Not only is Potrero Hill excluded, or mentioned with the intent of exclusion, in many key sections of the Draft EIR, but many of the conclusions drawn in the Draft EIR are clearly illogical and misguided. The most significant of these conclusions concern:...

- ..., air... (Sarah Ames)

South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...air pollution...that will accompany the new ballpark. (Janet Carpinelli)

Response

The EIR states in the first paragraph, p. III.127: "Occasional violations of state ozone and PM_{10} standards still persist [in the Bay Area], however, and although further air quality improvement is anticipated, attainment is not anticipated within the current 20-year planning horizon."

While project vehicular nitrogen oxide emissions would exceed the Bay Area Air Quality Management District (BAAQMD) significance threshold, there is no reason to believe that the project would interfere with the Bay Area's anticipated continued progress toward the state ozone standard. While project vehicular carbon monoxide emissions could cause or contribute to carbon monoxide standard violations in the South of Market area in the near-term (i.e., until shortly after the year 2000), the EIR analysis shows that such violations would not persist in the long-term (i.e., much after the year 2000), and carbon monoxide levels would eventually be less than they are now over most of the South of Market area. Both ozone and carbon monoxide standards are based on the avoidance of all known adverse health and welfare effects. Thus, progress toward their attainment should assure the long-term improvement of the Bay Area's quality of life.

The average carbon monoxide emission rates for the motor vehicle fleet that were used in the EIR analysis include only the emission controls already adopted by federal and state governments and do not assume that additional more-stringent controls will be adopted in the future. The long-term improvement shown in carbon monoxide levels South of Market Street comes about as newer vehicles (with presently mandated) emissions controls join the fleet and as older vehicles are retired. The carbon monoxide modeling for the year 2015 also includes the effects of project traffic and that from all other anticipated cumulative projects that would affect the South of Market area. It is always a possibility that a political movement to repeal the present vehicular emission controls could arise, but current public support for vehicular emission controls appears to be strong, and no credible legislative efforts for the repeal of such controls are in process.

The decision not to analyze carbon monoxide impacts from project and cumulative traffic on the Potrero Hill and South Beach communities was based on the findings of the EIR traffic analysis, which did not show substantial increases in traffic volumes or substantial degradation of intersection Level-of-Service (LOS) in these areas. BAAQMD CEQA guidelines recommend CALINE4 analysis at receptors near intersections or streets where the

LOS is D or worse.[33] This would not occur in the residential neighborhoods on the north and east sides of Potrero Hill, as evidenced by the EIR LOS analysis at the Mariposa/Vermont and Mariposa/DeHaro intersections. Nor would it occur at The Embarcadero/Townsend, The Embarcadero/Brannan, Second/Townsend, and Second/Brannan intersections, which surround the main residential area of South Beach.

As the air quality impacts analysis shows, by the year 2015 it is not expected that any intersections or receptor locations analyzed would violate state or federal CO standards. Because the intersections analyzed showed generally worse operating conditions than those on Potrero Hill and in the South Beach area, it is reasonable to assume localized carbon monoxide from traffic in those areas would also meet standards.

Traffic Air Pollutants

Comments

One last aspect of this EIR really disturbs me! The Air Quality element, although inextricably linked to traffic, seems almost divorced from the traffic analysis. Despite 13 separate afternoons of an 80-home-game season when almost every intersection south of Market degrades to a level of service (LOS) E or F, only five intersections are listed by the Bay Area Air Quality Management District (BAAQMD) as exceeding state and federal standards for CO.

This, together with a statement that ROG and NOx levels will not exceed BAAQMD thresholds indicate to me that something is terribly awry. Either BAAQMD thresholds are uselessly low or somebody didn't get the word.

Considering the adverse impact of post-game cold start air pollution on thousands of pedestrians and hundreds of residents alike, I really think that the air quality projections should be re-evaluated. At least let's see some contoured plumes based on the traffic simulations. (Silva B. Creg)

Page IV.214 Parking shortfalls can lead to significant environmental effects with respect to air quality, if the result is increased cruising to look for spaces, resulting congestion and traffic jams which results in overall slower traffic movement which prolongs idling

33. Bay Area Air Quality Management District, *Bay Area Air Quality Management District CEQA Guidelines: Assessing the Air Quality Impacts of Projects and Plans,* April 1996, p. 37.

"increased engine run times," with resultant unnecessary gasoline consumption (waste of resources), air pollution hot spots, and overall increases in air pollution. (Rincon Point South Beach CAC)

One of the things I noticed today in the paper was that Representative Pelosi is trying to amend CEQA regulations and EIR -- EPA regulations to bring in children and elderly who were currently not included in the air pollution, air quality analyses that are done. I personally live in South Park. The park is used quite a bit by children. The generation of air pollution by this project is going to be horrific, to say the least. (Jeffrey Leibovitz)

[T]his project will turn public streets into congested, blocked, gridlock parking lots where vehicles can't move and have no place to go. Air quality standards will be exceeded, dumping narrowly 1500 pounds of nitrogen oxide and particulate matter into the air on game days while creating elevated carbon monoxide pollution affecting a nearby school. (Joel Ventresca)

Response

The EIR analyses of both the project's regional vehicular ozone precursor and particulate emissions and of the effects of project and cumulative traffic on local carbon monoxide levels were based on detailed traffic data supplied by the project transportation consultant, as stated in the methodology subsections, pp. IV.264 - IV.265 (for vehicular emissions) and pp. IV.271 - IV.273 of the EIR (for carbon monoxide concentrations).

Among the factors included in the air quality analysis were the consideration of the effects of a post-game 100 percent cold start percentage for all attendees' motor vehicles (see p. IV.264, last sentence) and the availability of parking in the project area, which would affect the amount of idling and cruising with consequent effects on average traffic flow speeds, an important determinant of vehicular pollutant emission rates. The CALINE4 model used for the carbon monoxide analysis simulates the behavior of the carbon monoxide "plumes" as they disperse downwind from the roadways.

A carbon monoxide analysis was not performed for all of the traffic scenarios studied by the transportation consultant (i.e., the five different hourly periods corresponding to different game conditions); only weekday 6:30 - 7:30 p.m. (i.e., peak arrival hour for weekday night game) and weekday 10:30 - 11:30 p.m. (i.e., peak departure hour for weekday night game)

traffic scenarios were studied because night meteorological conditions tend to enhance local carbon monoxide concentrations. This is a conservative approach where carbon monoxide impacts may be slightly overstated. Similarly, the carbon monoxide analysis was not performed near all the intersections and roadways studied by the transportation consultant, but at representative locations where project and cumulative traffic volumes, and consequently, the carbon monoxide levels, would be high. For example, two of the receptor locations chosen for the project carbon monoxide analysis are near or in South Park (i.e., the multi-family residential use on Third Street and the residential/park uses along South Park Drive). As shown in Table IV.G.2, p. IV.275 of the EIR, a violation of the 8-hour CO standard at the residential use along Third Street is shown in the year 2000, but no carbon monoxide standard violations are predicted for the residential and park uses further away from Third Street in South Park. Violations of carbon monoxide standards in the year 2000 are apparent at several other receptors shown in Table IV.G.2. Similar violations could occur at other locations in the project area. The EIR provides reasonable examples of the project's effects on localized carbon monoxide levels. No violations of state or local CO standards are predicted by the year 2015, as explained above.

The EIR analysis of regional air quality impacts shows that the net vehicular pollutant emissions from the proposed ballpark without the other project commercial uses would not exceed BAAQMD thresholds, but that the net vehicular nitrogen oxide emissions from the proposed ballpark and the other project commercial uses would exceed the BAAQMD threshold. These thresholds have recently been lowered by almost 50 percent, from 150 lb/day to 80 lb/day, as a result of revisions to the *BAAQMD CEQA Guidelines*. They are considered to be quite stringent.

As noted in Project Description, General, fifth response, the sponsor is contemplating removal of the restaurant component of the project. If this element of the project were eliminated, the overall project would not cause any exceedance of regional thresholds in 2015.

Parking Garage

Comments

[W]e are concerned that the vented exhaust in the garage below South Beach Park will be blown by the west wind over the park. (Andy Katz, San Francisco Tomorrow Waterfront Committee)

Previous plans have shown that the combined garages, under the Park and under the stadium, would vent emissions through the left field bleachers. This means that the prevailing winds would blow that exhaust directly over the Park. Why isn't this examined in the DEIR? (Andy Katz, Chair; Jennifer Clary, Mary Anne Miller, Jane Morrison, San Francisco Tomorrow Waterfront Committee)

Response

The air vented from the parking garages proposed below the SFRA's South Beach Park extension and below the proposed ballpark would contain carbon monoxide, but in concentrations substantially below that of exhaust exiting directly from the tailpipe of a car. Occupational Health and Safety Administration (OSHA) regulations require ventilation of parking garages to assure that garage workers are not exposed to unhealthful carbon monoxide levels. This is done by adjusting the ventilation rate (i.e., the number of air changes per hour) to limit carbon monoxide buildup. As a consequence, the carbon monoxide level in the air exiting the garage vent would be at the OSHA limit. Once the garage air leaves the exhaust vent, the carbon monoxide it contains would be further diluted as it disperses in the atmosphere during the transport distance between the vent and the proposed South Beach Park extension areas. Once the garage air arrives there, its carbon monoxide levels would not be much above the background level, which is substantially below the state and federal ambient carbon monoxide standards.

As explained in the responses in Project Description, under Service Driveway Access, South Beach Harbor Parking, and South Beach Park, the SFRA may not place the proposed 210 to 250 parking spaces under a bermed extension of South Beach Park, but rather replace the proposed bermed park extension by a surface parking lot or place parking in some other area. If the SFRA does not build an enclosed garage, the amount of carbon monoxide

emitted by the ballpark garage ventilation system would be further limited. Emissions from SFRA parking and the dispersement of CO emissions from this parking cannot be definitively analyzed until its final location and configuration is selected. The smaller, 50-space ballpark parking garage being considered by the project sponsor would emit about 60 percent less CO than with the 180 spaces discussed in the EIR.

Construction

Comments

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: ...[d]ust due to demolition/construction. (Ship Clerks' Association, Local 34, ILWU)

Construction Air Quality Impact: The Bay Area Air Quality Management District's threshold will be exceeded by the construction at the site. (DEIR IV.278). However, the impact of this on the CBL Office Buildings is not discussed. (David P. Cincotta, representing China Basin Landing, Ltd.)

No mention is made of the impact to be made on the harbor by the construction process. Again because of the prevailing winds, the harbor will bear the brunt of debris, dust, and litter created by construction. (Doug Gooding, CAC member)

How will the noxious effects of the construction site be dealt with? For example,...dust... (Michael Karasik, Bayside Village Associates)

The environmental impacts on South Beach Harbor warrant specific attention....With respect to South Beach Harbor, it must analyze the following. "Blow off" from construction (grit and oil / paint vapors), fan litter, and fire works soot are not adequately addressed as impacts on boats and boat users. (Martin Fay, Rincon Point - South Beach CAC)

Debris, possibly damaging, during and after construction:

Iron or steel filings, landing on a fiberglass deck in a salt water atmosphere, corrode and leave an orange stain in the fiberglass that must be removed with acid. If the filings are ground into the deck, pits result. What other particulate or gaseous materials will be released over the harbor? Covers over the boats should be considered as a mitigation. There is precedent for this at Moss Landing harbor.

Other debris might also be damaging. Fireworks are a particular concern, as hot sparks can reach both the water and the canvas covers that are on most boats. Fires are conceivable. Notice that during the July 4 fireworks, the Coast Guard keeps boats hundreds of yards away

from the fireworks. Again, because the EIR does not address this, we can only speculate. (Richard Locke, Jr., South Beach Yacht Club)

During construction, who will pay for rust removal, boat cleaning, boat covers, etc...

...Who will pay for damage done to our expensive boats from airborne fireworks embers caught in the prevailing westerly winds. Project sponsors must set up an efficient mitigation system for claims resulting from debris damage to boats in South Beach Harbor. (Mark Miner)

Impact on the South Beach marina, including...fireworks...must be considered and minimized...

...Impact on the South Beach marina, including...construction debris must be considered and minimized. (Abigail A. Grafton, M.A., M.F.C.C.)

There is no discussion of the need for protections from windblown debris during project construction and ballpark operations. Cinders from fireworks can seriously damage boats downwind from the fireworks displays. Airborne metal particles during construction can harm boats. Windblown dust and debris can abrade boat finishes. This has been totally left out. (Sue C. Hestor, Advocates for South Beach Harbor)

Impacts on use and enjoyment of the South Beach Yacht Harbor are also not adequately covered, including...potential for construction related damage to vessels from wind driven dust, grit and vapors. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Somebody briefly mentioned the iron filings. I just want to point out what iron filings do when they hit a white fiberglass surface -- and there are 800 white boats out there. They leave themselves a nice stain that [has] to be etched off with an acid based cleaner. And when you are through with that, if they have been ground into your deck at all, you wind up with small pits in your deck. It is destructive.

We hope in terms of this issue, which was not addressed at all, that there is -- either a mitigation of boat covers being required or some very, very effective screening of the inevitable debris that is going to be raised by demolition of old buildings and by welding on the new ballpark. (Dick Locke)

During the 28 months of construction, please use all methods necessary to protect our investment from flying debris, welding fumes, flame cutting, metal chips and general construction dirt. (David Davis)

I'm sure you are going to be capable of putting up barriers to prevent ashes and welding sparks and all that stuff coming down onto the boat, and I just want to emphasize, please do

a very good job of that, because it is a real, real problem cleaning a boat that has welding splashes coming down from the girders. (Dave Davis)

The wind will carry debris, and the debris that can [come] off of a site like that includes iron filings, as well as things from welding, which can deposit on the boat and create serious damage. I refer each of the commissioners to the incidence at Moss Landing where in Moss Landing a PG&E power plant was required to buy boat covers for each of the boaters at Moss Landing Harbor, and I would recommend that as one of the steps to mitigation that should be seriously considered for each of the 700 boaters and 1,000 boaters that are down on South Beach Harbor. (Kirk Kelsen)

Response

No short-term or long-term health impacts are anticipated from demolition/construction dust (see p. IV.278 of the EIR, third paragraph, first sentence), provided the BAAQMD-approved mitigation measures, proposed as part of the project (see p. V.63), are implemented.

Material that could leave the ballpark site as wind-driven particulate matter during the construction period (demolition of existing buildings, excavation of the site, and construction of the new ballpark and ancillary facilities) includes dust (grit, filings, splinters), aerosols (minute droplets of paint, oil or solvents perceived as vapor), and pieces of paper. It would be the responsibility of the general contractor to control the placement and uses of project material, to enforce procedures for maintaining a clean work-site, and to prevent the generation of off-site deposition or hazards as the result of "blow-off." As listed on p. V.63 of the EIR, six mitigation measures approved by the BAAQMD for the control of air-borne particulate matter have been included as part of the project. These measures include covering potential particle sources with tarpaulins, sweeping paved areas, spreading limited amounts of water or soil stabilizers on unpaved areas and specific sites of particulate generation, and suspending work during specific high-wind conditions.

It would be the responsibility of the general contractor to ensure that dust suppression measures (water sprinkling, soil stabilizing, stockpile covering) are maintained whenever and wherever dust may be generated throughout the construction period (see pp. V.63 and IV.310 of the EIR). This is particularly important during the demolition of old buildings when particles of plaster, brick, cement, wood, and insulation may become air-borne. Excavation,

drilling, and pile driving can produce dust-sized particles of soil and old fill. During the fitting and connecting of structural elements, dust may be generated by the welding and grinding of steel and components, and the drilling and grinding of concrete. Architectural, utility installation, and detail work typically include sanding of wood and plaster; trimming of wires, pipes, and fabrics; and the ubiquitous presence of paper-wrapped material, all of which can contribute to wind-blown dust, as well as larger-sized particles.

Aerosol control can be achieved by using protective wind screens, and focusing-aperture nozzles on spraying devices. Protective wind screens and litter-collection fencing also can prevent larger pieces of insulation and wrapping material from leaving the site. The litter fences need to be inspected and cleaned as part of the routine site maintenance procedures. As stated on p. V.63 of the EIR, performance of these types of procedures would be required as part of the construction contract. City inspectors or Port staff would be on site during construction of the project.

Potential welding sparks are of concern, but are not related to a significant adverse effect. Welding sparks typically fly 2 to 3 ft. from the point of origin. Uncommonly, a spark may fly 10 ft. Beyond that distance welding debris consists of cold ashes rather than hot sparks.[34] The control of welding sparks is covered in the responsibilities of the general contractor to prevent the generation of off-site deposition or hazards as the result of "blow-off," which are required as part of the construction contract (p. V.63 of the EIR).

One of the comments related ballpark construction conditions to PG&E activities at Moss Landing. To ascertain what sort of programs were made available by PG&E to compensate boat owners for potential damage by welding sparks, construction dust and aerosols (previously described), and fireworks soot (see below), PG&E was contacted regarding possible similar conditions at Moss Landing. The conditions at Moss Landing are not related to welding, construction, or fireworks and would not be similar to the construction conditions

34. Mike Brightenstein, P.E., Construction Engineer, Moffatt & Nichol Engineers, telephone conversation with EIP Associates, May 13, 1997.

of the proposed ballpark. At Moss Landing, the routine cleaning of boilers by PG&E sometimes causes rust to be blown out of the stacks when the boilers are restarted. Some rust particles drift downwind onto boats moored at least 100 yards from the PG&E facility.[35]

As stated on p. V.69 of the EIR, a program for the control of litter generated by ballpark patrons is recommended as part of the Water Quality and Aquatic Ecology mitigation measures. The program would provide for the use of trash receptacles, regular trash collection, public notices, and the regular skimming of the surface of China Basin Channel. This program is not included in the proposed project, but may be required by the City, the Port, or the SFRA as a condition of project approval (p. V.1 of the EIR).

Fallout from fireworks must be controlled by every agency that celebrates special events with pyrotechnical displays. Wind speed, wind direction, launch direction and height, and missile composition all play a role in determining where and how much fragmentary material may fall during the display. At 3Com Park, the current "fallout" area established by the Fire Marshall's Office for aerial displays is a portion of the parking lot that is fenced to exclude unauthorized personnel. Falling fragments typically are cold cinders of paper or cardboard less than a square inch in size, but hot fragments are not uncommon. Members of the San Francisco Fire Department are on site to control any accidental fires. A representative from the Fire Marshall's Office is on site to ensure all appropriate safety precautions are taken and to determine whether or not the display is to proceed, given the wind conditions prior to and during the display. Occasionally, it has been necessary to wash soot or ash from some autos parked adjacent to the fallout area, but this is a rare occurrence.[36] At the proposed ballpark, fallout area may be over the Bay, similar to recent Fourth of July celebrations. Small boats generally have clustered near the launch barges during these events, with safety maintained

35. Martha Rush, Environmental Officer, PG&E Moss Landing, telephone conversation with EIP Associates, May 7, 1997.

36. Jorge Costa, Vice President of Stadium Operations and Security, San Francisco Giants, telephone conversation with EIP Associates, May 16, 1997.

by the U.S. Coastguard. It is not expected that boat washing would be necessary for ballpark fireworks displays.

With respect to wind speed measurements taken in the vicinity of the Marina and the proposed ballpark, the methodology of measurement and wind-tunnel simulation is described and documented on pp. A.55 - A.90 of the EIR. A brief discussion of the techniques used to extrapolate modeled data appears in Wind, General. As stated in Wind, Winds-South Beach Harbor, the wind tunnel study established that the proposed ballpark would not increase winds in South Beach Harbor.

Air Quality Mitigation

Comments

From an air quality perspective, Bay Area Air Quality Management District (BAAQMD) staff believe that the ballpark's proposed location in San Francisco's South Beach area is superior to 3COM Park, where baseball games are currently played. The proposed site is far better served by transit and much more accessible by walking and bicycling. This is another commendable example of the City and County of San Francisco's commitment to infill, densification and other land use strategies that reduce automobile dependence.

Despite its transit-accessible location, however, the project will still attract a large number of vehicle trips, which the DEIR shows will have significant impacts on local and regional air quality. Also, because of the project's infill nature near established neighborhoods, the impacts will be perceived more acutely...[W]e encourage the City and project sponsor to minimize the project's impacts to air quality. (Ellen Garvey, Air Pollution Control Officer, Bay Area Air Quality Management District)

The DEIR does not adequately address the [e]ffect that the concerts and ballgames will have on Potrero Hill in terms of noise, air and light pollution. How will air pollution be mitigated? (Sarah Ames)

Response

Several mitigation measures listed in the EIR would have beneficial effects on regional and local air quality if implemented, including:

1) The adoption of a traffic routing plan to direct all non-project traffic to alternate routes so that only project and other traffic with a destination in the ballpark vicinity would use local streets and intrusion into nearby residential areas would be discouraged (see p. V.6, last paragraph, and subsequent discussion of traffic routing specifics, as summarized in Figure V.B.1, p. V.8).

2) Provision of ferry service from several access points around San Francisco Bay to a berth near the proposed ballpark (see p. V.41).

3) Development and implementation of a program that encourages transit use and other alternative modes of travel to the ballpark (see p. V.43).

4) Development of a transportation demand management plan for ballpark employees and concessionaires (see p. V.44).

In addition to the mitigation measures to be implemented by the project, agency emission controls would eliminate violations in the South of Market area by 2015. See also responses, Air Quality, General, above.

Construction Mitigation

Comments

p. V.63 General comments related to Air Quality mitigation measures. While the proposed steps to control dust and dirt are reasonable, they should be rewritten to require the use of water sweepers and to require quick response to complaints.

Recommendation I: Require the project to use water sweepers for all required sweeping of paved areas and streets.

Require the project to have a project staff member inspect each truck leaving the site to confirm it is loaded and covered in accordance with contract requirements, and to maintain a log available to the EIR mitigation consultant.

Require the project to implement dust control measures within one hour of a complaint being transmitted to the project. (John Moll, Assistant Vice President, O'Brien Kreitzberg)

Dust measures can be imposed on construction. (Doug Gooding, CAC member)

Standard construction mitigation measures for residential neighborhoods shall be employed by the construction team, irrespective of the Giants time constraints, including but not limited to dust control,...etc. See also the report of O'Brien Kreitzberg. (Michael Karasik, Bayside Village Associates)

There are several grave concerns and questions with respect to construction impacts... standard construction mitigation measures for residential neighborhoods shall be employed by the construction team, including but not limited to, dust control,... etc. (Martin Fay, Rincon Point - South Beach CAC)

Response

Water sweepers are already mentioned as the preferred mode for the cleanup of paved construction areas and local streets during construction (see EIR p. V.63, Measures Included as Part of the Project, fourth and fifth bullets).

A construction coordinator would be appointed to ensure implementation of dust control measures (as noted in response under Transportation, Construction Transportation, *Construction Traffic*). The following improvement measure has been added to p. IV.279 in the EIR, immediately before the endnotes:

> **As noted on p. IV.233 under Transportation, Construction Improvement Measures, a neighborhood construction coordinator could be appointed by the project sponsor to ensure implementation of dust control and other construction measures.**

SEISMICITY

Loss of Life

Comment

Seismic problems at the site could lead to loss of life during a major earthquake, which is in the report. (Joel Ventresca)

Response

The commentor properly indicates that there is a potential for local geotechnical conditions to contribute to loss of life resulting from any major earthquake generated by regional seismic activity. Addressing geotechnical conditions is required by the City, and is part of the proposed project. As stated on p. III.133 of the EIR, all new structures built for human occupancy in California are required by state law to be designed to withstand the anticipated effects of seismic activity. San Francisco requires site-specific geologic or soil engineering investigations to identify and mitigate potential geologic hazards at development sites in areas of the City that are subject to such seismic hazards as liquefaction, tsunamis, and excessive groundshaking (see pp. III.134 - III.140 of the EIR). As stated on p. IV.280 of the EIR, the proposed ballpark project would comply with all legal requirements for seismic-resistant design and construction. Pages IV.281 - IV.284 of the EIR outline the seismic hazards related to the subsoils at the ballpark site and the structural design features that would be employed to ameliorate them. Additionally, as stated on p. III.285 of the EIR, the project sponsors would develop policies and plans to deal with anticipated emergencies at the proposed ballpark, and would integrate them with the police and fire departments' Emergency Response Plans. As recommended in the mitigation measure on p. V.65 of the EIR, the project sponsors would develop an Evacuation Plan specifically for the proposed ballpark, and would integrate it with the City's Emergency Response Plans for dealing with major emergency situations, such as earthquakes. The Giants have such plans in place at their existing facility at 3Com Park, and are experienced in using them, as demonstrated during the 1989 Loma Prieta earthquake.

Effects of Pile Driving on China Basin Channel

Comment

There are several grave concerns and questions with respect to construction impacts... Pile driving - will there be reflected shock waves from pile driving resulting in sediment uplift in China Basin Channel? Will pile driving cause other effects such as slumping of channel edges? (Martin Fay, Rincon Point - South Beach CAC)

Response

As stated in the mitigation measure on p. V.67 of the EIR, silt curtains would be installed around submarine pile-driving locations to prevent resuspended sediments from drifting away from the pile-driving locations.

Vibrations from submarine and on-shore pile driving are damped naturally by the ground through which they pass. All vibrations die out completely within a few hundred feet of the source. The strongest vibrations die out within 5 to 15 ft. of the pile-driving location, depending on the type of pile (concrete, steel, wood), the competence of the formation into which the pile is being driven (dense sediment, weathered rock, firm rock), and the medium through which the vibrations are traveling (rock, sediment, water). A critical factor in assessing the potential for vibration-caused damage is the distance from the source (the tip of the pile) to the area of concern. For slope-stability concerns, other critical factors are the degree and condition of the slopes being affected.[37]

The vibrations from pile driving would not be sufficiently intense to cause damage to the steel bulkhead or the rock seawall, although vibrations would be felt at the bulkhead from driving the guide piles for the ferry landing in the Ferry Variant and for the first and second row of foundation piles north of the bulkhead. The earthen south side of China Basin Channel is more than 700 ft. from the closest pile-driving locations; much too far to be

37. Mike Brightenstein, P.E., Moffatt & Nichol Engineers, telephone conversation with EIP Associates, May 13, 1997.

adversely affected, even though the medium of transmission (Bay Mud) is soft, saturated sediment. On the north side of the Channel, bottom slopes within about 200 ft. of the closest pile-driving locations are between 1 and 2 percent; between 200 and 300 ft. from the closest pile-driving locations slopes are about 6 percent. These slopes might experience minor sloughing of surface sediment during pile driving (about as much as is produced by natural currents), but they are too shallow and too far from the vibration source to be subject to slumping or landsliding.[38]

Tsunamis

Comment

The EIR made special mention of seismic precautions and a sub-surface geo-grid polymer net to protect against liquefaction because of the high water table and 45' of fill underlying the site. No mention, however, is made of earthquake-induced tsunamis. An 8.3 quake that could produce a 30-foot wave front at the Golden Gate and a 3-foot swell at SFO could certainly be expected to produce a 6' front, moving at street speeds at the site. (Silvia B. Creg)

Response

As stated on pp. III.136 - III.137 of the EIR, the U.S. Army Corps of Engineers has created a computer model to calculate depths of flooding (runup) during the 100-year and 500-year tsunami, although damaging tsunamis entering San Francisco Bay are infrequent. The runup from the 100-year event would not reach the ballpark because the site is protected by a seawall and bulkhead which are high enough above mean sea level (about 12 ft.) to prevent the entrance of flood water from the Bay. The 500-year event could cause up to 3 ft. of inundation on the lowest portion of the site (near the entrance to China Basin Channel) if the tsunami occurred during an extreme high tide, but would not reach the majority of the site, which is higher than 11 ft. above mean sea level. The extreme high tide condition was used to establish the worst case analysis for this site, and, as stated on p. III.136 of the EIR, the

38. Mike Brightenstein, P.E., Moffatt & Nichol Engineers, telephone conversation with EIP Associates, May 13, 1997.

occurrence of a 500-year tsunami during this condition has a probability of less than two-thousandths of one percent each year; it simply is not a condition that reasonably can be required as a design criterion.

As stated on p. III.137 of the EIR, the dynamics of regional faulting in the San Francisco Bay Area generally preclude tsunamis following major local earthquakes, but not seiche effects (sloshing of water in a bay or lake). About 6 inches of seiche effect was recorded in Monterey Bay following the 1989 Loma Prieta earthquake.[39] Previously recorded tsunamis in San Francisco Bay following distant earthquakes (such as the 1964 Alaska earthquake) occurred as tides rising rapidly to a few feet above normal, causing damage to boats and piers in the East Bay and in Sausalito; no 6-foot wall of water rushed across San Francisco Bay in 1964.[40] Nor was there any tsunami in 1906, following the largest historical earthquake on the North Coast, San Francisco Peninsula, and Southern Santa Cruz Mountains segments of the San Andreas fault; the seiche effect was 4 inches.[41] Despite the lack of dramatic wave-fronts, the threat of flooding and damage by tsunami or seiche in San Francisco Bay is real, and has been taken into consideration in the analysis of potential seismic hazards at the proposed ballpark. The height of the seawall, bulkhead and ballpark above mean sea level is sufficient to preclude flooding during the most frequent tsunami or seiche events anticipated for the China Basin area.[42]

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39. Edward Thornton, E.B., Ph.D, Department of Oceanography, Navel Post-Graduate School, telephone communication with EIP Associates, October 31, 1991.

40. Diane Pierzinski, "Tsunamis," in: *California Geology*, California Division of Mines and Geology, March 1981, v.33, n.3, pp. 58 - 61.

41. Andrew Lawson, *The California Earthquake of April 18, 1906, Report of the State Earthquake Investigation Commission in Two Volumes and Atlas*, Carnegie Institution of Washington, Publication Number 87, Washington, D.C., 1908,V.I, p. 370.

42. Andrew Garcia, and James Houston, *Type 16 Flood Insurance Study: Tsunami Predictions for Monterey and San Francisco Bays and Puget Sound*, United States Army Corps of Engineers Technical Report H-75-17, Hydraulics Laboratory, United States Army Engineers Waterways Experiment Station, Vicksburg, Mississippi, November 1975, Figure 56.

CONTAMINATION AND ENVIRONMENTAL RISK

Site Investigation

Comment

The location of hazardous materials is impossible to tell from the text. At a minimum a map showing locations of problem areas should be provided in the main text. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

With the exception of an area containing elevated concentrations of BTEX and coal-tar related compounds, the discussion of soil quality on pp. III.160 - III.161 of the EIR shows that the distribution of contaminants are throughout the site and are not concentrated in any one particular area. Therefore, the text discussion is sufficient to convey the information, and a figure showing that contaminants are evenly distributed throughout the site is not necessary.

The area containing BTEX and coal-tar related compounds was referenced to Figure X.F.3, p. A.162 of Appendix F, Contamination and Environmental Risk. As shown, the area containing elevated levels of contaminants is near well point WP-06, just south of King Street. Appendix F describes the background methodology for the site investigation. The figures in the appendix illustrate the narrative discussion and show how sampling locations were selected. The Setting section for Contamination and Environmental Risk describes the results of the site investigation (pp. III.158 - III.162 of the EIR). Therefore, instead of creating a separate figure showing the area of concentrated BTEX and coal-tar related compounds, readers were referred to Figure X.F.3 in the Appendix of the EIR.

Comment

The *CEQA Statutes* states that the lead agency shall consult the list compiled under Government Code §65962.5 by CAL EPA to determine if the project site is included on a toxics site. This EIR has not included a copy of this list or indicated that this list was consulted. (Scott MacPherson)

Response

Government Code §65962.5 requires various agencies to compile certain types of lists, and all lists were consulted as part of the site investigation for the ballpark. Two regulatory database searches were conducted during past investigations for this and adjacent sites. The first database review was conducted by VISTA Environmental Services in 1995 for Woodward Clyde, and the second one was conducted by Environmental Risk Information and Imaging Services for Geomatrix for an adjacent property. Both database searches were consulted in the development of the work plan for the site investigation (see Note 1 on p. III.163 of the EIR).

Comment

The EIR also mentioned underground tanks buried at the sloping ballpark site where the water table lies just 4 to 8' below ground level. I suspect that most of the toxic petroleum and cyanide residues are already at or below the phreatic boundary and disbursed over the entire site.

The EIR contains a rather thoroughly researched historical and cultural background check of the site (VI-A42-47), but there is no mention of any debris dumping after the 1906 earthquake. Much of the rubble was removed expeditiously and dumpsites may not show up in the usual records. This should be investigated. (Silva B. Creg)

Response

Several investigations of the ballpark site have been conducted in the past, as described on pp. III.155 - III.156 of the EIR. Collectively, those investigations provide a sufficient understanding of subsurface conditions across the site, including at and below the soil/groundwater interface (i.e., the phreatic boundary). Detected chemical concentrations in soil and groundwater, including petroleum constituents and cyanide, do not pose a significant risk to human health or the environment.

Rubble from the 1906 earthquake is discussed on p. III.154 of the EIR. Although dumping of debris at the site is important in understanding what might have contributed to existing contamination, the *Site Investigation Report and Risk Evaluation* provides the most complete

understanding of chemical contamination at the site. Information from several previous investigations performed for the site was reviewed and used to determine the scope of the most recent site investigation for the project. The intent of this investigation was to collect additional soil and groundwater samples at the site such that subsurface conditions were characterized to the extent necessary to complete the risk evaluation. As a result, samples were collected in this and previous investigations from across the site, including possible fill areas. Therefore, no additional investigation of the fill history at the site is necessary.

Comments

III.154 - Site background, Fill History, etc.: Your backup report in the appendix gives a lot more information on contaminants in the park site to the east of the ballpark than is set out in this section. Since part of the ballpark -- the access to the garage -- is on this site, and since that site [is] part of the cumulative development context, please explain the problems with the park site as well. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

III.176 - Groundwater Quality: Again, the information in the appendix regarding the adjacent park site should be included in the description of the problem. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

[IV. 286] The referenced site investigation provides information on both the ballpark site and the park expansion site, but only the ballpark information is included in the EIR. The site study shows that there are significant problems with the soils in the park site. Given the detailed protective measures which must be taken with the soils and groundwater on the ballpark site, we assume that similar measures must be taken for the park expansion site. Unless analysis of the impacts of both sites and measures to mitigate the impacts of these problems are included in the same EIR the Agency is not being presented with legally sufficient information to make its determinations on the feasibility of avoiding soils contamination.

Is this entire site -- ballpark and park -- to be remediated at the same time? Is it to be done in phases, first the ballpark, then the park? If it is done in phases it is more likely that problems will be encountered handling this project because an artificial line would be drawn through contaminants that straddle the boundary.

Also, while the Giants may have sufficient funding to do proper rememdiation, it is not so apparent that the Agency has either the funds or the ability to manage this project separately. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

The site access driveway is on the San Francisco Redevelopment Agency's (SFRA) South Beach Park site (see Project Description Redevelopment Agency Planning for Service Drive Access, South Beach Harbor, and South Beach Park Extension for further information regarding the SFRA's proposal for South Beach Park). Contamination issues for the driveway were examined by the SFRA as part of its Phase II site assessment of the South Beach Park site, and a Site Mitigation Report was prepared in 1993 to comply with the City's Maher Ordinance requirements (see pp. III.151 and A.152 - A.153 of the EIR for information about the Maher Ordinance, and pp. IV.297 - IV.300 and South of Channel Parking Areas for a discussion on how compliance with the Maher Ordinance is achieved). The Site Mitigation Report for South Beach Park identifies recommended guidelines for construction and operation of the park site to mitigate, or minimize, identified potential risks. Construction of the site access driveway would be required to comply with the guidelines outlined in the Site Mitigation Report.

Information about existing contamination on the park site was developed through the SFRA's Phase I and Phase II site assessments conducted for the park. Therefore, the following information has been added to the end of p. III.162 of the EIR (preceding the "Glossary" section) to describe the soil and groundwater conditions and the mitigation requirements for the proposed driveway area:

> **Site Conditions for Access Driveway**
>
> **The access driveway proposed off the Second Street right-of-way (see Figure II.D.2 on p. II.10) is part of the San Francisco Redevelopment Agency's (SFRA) South Beach Park site, proposed by the SFRA for redevelopment into an extension of South Beach Park, including additional parking for South Beach Harbor. Contamination issues for the driveway were examined by the SFRA as part of its Phase II site assessment of the South Beach Park site. The Phase II site assessment found that heavy metals, such as lead, polynuclear aromatics (PNAs) and petroleum hydrocarbons were present in subsurface soils above levels of detection.[18]**

Based on the results of the Phase II site assessment, a health risk assessment and a *Site Mitigation Report* were prepared to comply with the City's Maher Ordinance requirements.[19] The health risk assessment indicated that cancer and non-cancer risks were present at levels greater than the accepted cancer and non-cancer threshold risk levels for all potentially exposed groups considered in the risk analysis. Recommended measures for site mitigation include following procedures in the *Health and Safety Plan* developed for construction of South Beach Park, using imported fill for landscaped areas, installation of a clay cap, and following utility maintenance guidelines developed in the *Site Mitigation Report*. The *Health and Safety Plan* includes procedures for minimizing exposure such as donning personnel protective equipment, implementing dust control measures, and proper management of disturbed and/or excavated soil. The utility maintenance guidelines outline the nature of soil contamination, notification procedure or health and safety responsibilities, and soil management requirements to ensure that maintenance workers are not exposed to in-place contaminants. Any construction proposed in the South Beach Park site would have to comply with the requirements of the *Site Mitigation Report*. Therefore, the project sponsor would implement the procedures in the *Site Mitigation Report* for construction work conducted for the service access driveway. Since preparation of the *Site Mitigation Report*, the SFRA has conducted additional Phase I and Phase II site assessments.[20] These recent assessments corroborate the 1993 *Site Mitigation Report*.

The following has been added as new Endnotes 18, 19 and 20 to p. III.164 of the EIR:

18. Baseline Environmental Consulting, *Report on Phase II Site Assessment, South Beach Park Project, San Francisco, California*, prepared for San Francisco Redevelopment Agency, July 1992. *A copy of this report is on file for public review at the San Francisco Department of Public Health, Bureau of Environmental Health Management, 101 Grove Street, San Francisco.*

19. Baseline Environmental Consulting, *Health and Safety Plan, South Beach Park Project, San Francisco, California*, prepared for San Francisco Redevelopment Agency, July 1993. *A copy of this report is on file for public review at the San Francisco Department of Public Health, Bureau of Environmental Health Management, 101 Grove Street, San Francisco.*

    Baseline Environmental Consulting, *Site Mitigation Report, South Beach Park Project, San Francisco, California*, prepared for San Francisco Redevelopment Agency, July 1993. *A copy of this report is on file for public review at the San Francisco Department of Public Health, Bureau of Environmental Health Management, 101 Grove Street, San Francisco.*

20. **Treadwell & Rollo, Inc./Olivia Chen Consultants, *Phase I Environmental Site Assessment, South Beach Parking Structure and Maritime-Use Building, San Francisco, California*, prepared for San Francisco Redevelopment Agency, October 30, 1996.** ***A copy of this report is on file for public review at the San Francisco Department of Public Health, Bureau of Environmental Health Management, 101 Grove Street, San Francisco.***

Treadwell & Rollo, Inc./Olivia Chen Consultants, *Environmental Site Characterization, South Beach Parking Structure and Maritime-Use Building, San Francisco, California*, prepared for San Francisco Redevelopment Agency, January 31, 1997. ***A copy of this report is on file for public review at the San Francisco Department of Public Health, Bureau of Environmental Health Management, 101 Grove Street, San Francisco.***

The following sentence has been added at the end of the first full paragraph on p. I.44 of the EIR:

Construction activity for the access driveway would be subject to the Site Mitigation Report prepared for the SFRA's South Beach Park extension project.

As discussed in Project Description, Redevelopment Agency Planning for Service Drive Access, South Beach Harbor Parking, and South Beach Park Extension, since publication of the Draft EIR the SFRA is contemplating a less expensive scheme for expansion of South Beach Park involving a 210- to 250-space surface parking lot south of the existing park. If selected, construction of the surface parking lot would not require excavation and would not disturb subsurface soils or groundwater, and Maher Ordinance requirements would not be triggered.

Soil Handling

Comment
I want to reiterate generally a couple [of] concerns raised about the soil -- the proposed handling of the toxics in the soil during the construction. One of the quotes that I saw in the statements, "Although chemicals in the soil exceed hazardous waste levels, the results of human health risk evaluations did not [pose] an unacceptable health risk."

That's a big problem. I think the EIR would -- relies on [Geomatrix'] evaluations. And that those were done at the behest of the Giants. The Giants will look for the most economical

remediation of the site, which is fair enough, but I think the EIR and the Planning Commission has to really, really consider the environmental impacts of the tremendous amount of toxics in the soil and take the most aggressive approach.

Capping is mentioned as an approach, but it is not nearly as effective as removing those soils. (Leslie Caplan, Baykeeper)

Response

The commentor refers to the discussion on p. IV.298 of the EIR that the human health risk evaluation indicated that chemicals in the ballpark do not pose an unacceptable risk. As addressed on p. III.178 of the EIR, the San Francisco Bay Regional Water Quality Control Board (RWQCB) approved the *Site Investigation Report and Risk Evaluation* performed by Geomatrix, Inc., and did not require soil or groundwater remediation. The report was approved by the RWQCB on condition that a *Soil Management Plan* be prepared due to chemicals at the site exceeding state or federal hazardous waste standards. As described on p. IV.298 of the EIR, the *Soil Management Plan* satisfied the requirements of the San Francisco Department of Public Health (SFDPH) for a Site Mitigation Plan under the City's Maher Ordinance (administered and enforced by SFDPH), and the RWQCB gave final approval on the *Site Investigation Report and Risk Evaluation* without requiring site clean-up. Therefore, no soil and groundwater remediation would be necessary for the project. To clarify the above discussion, the following sentence has been added as the second sentence of the last paragraph on p. III.150 of the EIR:

> **The oversight agencies (RWQCB, DTSC and SFDPH) do not require remediation for this project.**

The following has been added to the last sentence of the first full paragraph on p. IV.294 of the EIR for clarification:

> **The oversight agencies approved the *Site Investigation Report and Risk Evaluation* which presents the results of the human health risk evaluation for the ballpark site and do not require further soil and groundwater remediation.**

The site investigation and risk assessment was required by the RWQCB because of the presence of known existing contamination from previous industrial uses on the site. The commentor is correct that the project sponsor funded the study; however, the SFDPH, the RWQCB, and the state Department of Toxic Substances Control (DTSC) have regulatory overview of such studies and must accept and approve them. All three agencies reviewed and commented on the draft version of the report to ensure that the study was conducted in accordance with accepted agency guidelines, and that other requirements, such as the SFDPH's requirement for a Site Mitigation Plan, were met. As stated above, these agencies approved the final study, indicating that they accepted its contents and conclusions.

Further, the commentor asserts that capping is not as effective as removing the soils. No capping is proposed for the ballpark other than covering the ballpark site with either the ballpark buildings or several feet of imported fill for the playing field. One of the findings of the *Site Investigation Report and Risk Evaluation* that contributed to the agencies' decision not to require site remediation was that chemicals in the soil, groundwater and ambient air would not pose an unacceptable risk to workers or visitors at the site, nearby residents or workers, recreational users of San Francisco Bay, or aquatic life in China Basin Channel. If the site were to undergo an unnecessary soil removal process, greater risks of exposure could be imposed than if the soil were left undisturbed.

South-of-Channel Parking Areas

Comment
The DEIR fails to adequately analyze the environmental impact of construction of the South of the Channel Parking on San Francisco Bay and its aquatic and bird life.

The South of Channel parking area, currently owned, in part, by the Catellus Development Corporation and, in part, by the Port of San Francisco, has been subject to the same or greater historical exposure to contaminants as the north of Channel Ballpark site. Among other things, the site was used as a switching yard with loading, warehousing and rail car areas and maintenance facilities. These activities combined with considerable demolition on the site indicate the presence of heavy metals, petroleum products, lead, asbestos, PCBs and other hazardous substances (Phase II Environmental Site Assessment (1997) prepared by

ERM-West, Inc.). The Parking Area site also includes at least one above ground storage tank, two underground storage tanks and leaking underground pipelines previously used to transport petroleum hydrocarbon. Shallow ground water south of the Channel has been demonstrated to flow directly into San Francisco Bay (p.1-3, Phase II ESA). This ground water has also been shown to be contaminated.

Proposed construction activities in the parking area include, but are not limited to, excavation of significant soil and ground water contaminants, surface grading, application of a variety of surfacing materials, striping, drainage, gutter, sidewalks, curbing, landscaping, lighting, fencing, gate and signage construction. All of these activities will disrupt and loosen contaminants presently buried on the site. The contaminants will travel the short distance to the Bay through the air, ground water and surface water run off. The DEIR fails to analyze the impacts on the Bay, its aquatic and bird life of the introduction of hazardous substances from construction at the South of Channel parking site and the impacts which might occur as a result of changes in drainage pathways. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

The South-of-Channel parking areas were not included in the original Site Investigation conducted for the main ballpark site north of the Channel because the proposal for the parking areas was not developed until after the scope of the Work Plan for the site investigation was determined. The following has been added as the third sentence to the last paragraph on p. IV.297 of the EIR:

> **The Work Plan did not include the South-of-Channel parking areas for analysis because the proposal for the parking areas was developed after the scope was determined for the site investigation.**

As noted in the comment, the area south of the Channel in Mission Bay contains numerous areas of soil and groundwater contamination, including contamination by petroleum products at H&H Ship Services. Soil and groundwater contamination by petroleum products was identified as a result of underground storage tank removal activities at the site. This facility recycles waste oil/water mixtures and is a tank-cleaning facility. Closure of the Treatment/Transfer Area of the facility is planned. Twelve above-ground storage tanks have been removed, and soil and groundwater sampling has been conducted to identify any soil and/or groundwater contamination related to the Treatment/Transfer Area; preparation of a

report is underway. One underground storage tank remains in place at this site.[43] The following paragraph has been added to p. IV.300 of the EIR as the second paragraph to further detail the potential site investigation procedures for the South-of-Channel parking areas:

> **Construction activities for the proposed parking area south of the Channel would consist of removing existing pavement, site grading, and shallow trenching to install utilities. Groundwater is unlikely to be encountered during these activities. Buildings currently present in this area would remain and sites which may be badly contaminated (e.g., possibly portions of H&H Ship Services) would be avoided.**
>
> **If more than 50 cubic yards of soil would be disturbed for the construction, requirements for the Maher Ordinance would need to be addressed prior to construction. These requirements include preparing a Site History of the parcel and, if the Site History indicates the potential for chemicals to have been released at the site, soil sampling for chemical analysis would be performed in areas of the parcel that would be disturbed. Because groundwater would not be encountered during the construction of the proposed parking area, groundwater sampling would not be needed. If soil sampling indicates the presence of elevated concentrations of chemicals in the soil, a risk evaluation can be performed to assess needed mitigation measures, if any. SFDPH provides oversight throughout this process; construction can proceed only if Maher Ordinance requirements have been addressed to the satisfaction of the SFDPH.**
>
> **Regardless of the amount of soil to be excavated, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared for the South of Channel sites, and would address potential erosion, sedimentation, and contamination in runoff to the satisfaction of the RWQCB.**

The following sentence has been added at the end of the first full paragraph on p. I.44 of the EIR:

> **If more than 50 cubic yards of soil were disturbed for construction of the parking areas South of the Channel, requirements of the City's Maher Ordinance would need to be addressed prior to construction, which could include a site investigating of the sites soil and groundwater quality.**

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43. City and County of San Francisco Planning Department, Port of San Francisco *Waterfront Land Use Plan, Final Environmental Impact Report*, SCH No. 94123007, January 3, 1997, p. 319.

Human Health Risk Assessment

Comment

If there are problems with the remediation given the wind patterns the most likely persons to be impacted other than the workers on the site are those in the harbor. (Sue C. Hestor, Advocates for South Beach Harbor)

Response

The *Site Investigation Report and Risk Evaluation* included an evaluation of potential health risks to on-site construction workers and off-site workers and residents (including those potentially located in South Beach Harbor) associated with inhalation of dust or vapors during construction activities at the site. Potential health risks to construction workers via inhalation of dust and vapors would be well within levels considered acceptable by regulatory agencies. Based on these results, potential health risks to off-site workers, residents and recreational users during construction activities are not of concern because inhalation exposures of off-site receptors would be significantly lower than those for on-site construction workers due to dispersion of chemicals in air with distance from the site.

Ecological Risk Assessment

Comments

III. The DEIR fails to adequately analyze the impact of increased contaminants on water quality and non human organisms.

The DEIR fails to utilize exposure limits appropriate to aquatic and bird life in its analysis of the environmental impact of the introduction of high levels of hazardous substances into the Bay.

Hazardous substances will reach Bay organisms through storm water run off, sewer overflows, resuspension and other means. The aquatic and bird communities are at risk of exposure to hazardous substances through the same and additional pathways as humans—skin contact, inhalation of vapors, ingesting water and smaller contaminated organisms. While acceptable toxicity levels for aquatic organisms are substantially lower than those considered safe to humans, the DEIR's detailed analysis of risks associated with identified contaminants is based entirely upon exposure limits set for human health and ignores demonstrated exposure levels of concern to nonhuman organisms (pp. IV.288-297). The DEIR's

conclusion that potential exposure to contaminants is safe for humans, fails to address the impact of contamination on aquatic and bird life. The DEIR fails to apply or address demonstrated exposure levels of concern to nonhuman organisms and species including aquatic life and birds in its analysis. A determination of safe to humans does not provide a relevant analysis of safety to the Bay's aquatic and bird life.

In order to adequately assess the impact of increased toxicity of the Channel and Bay waters on aquatic life, the DEIR must conduct an analysis using the standards appropriate to all of the organisms that will be exposed to contaminants. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

The DEIR fails to analyze the cumulative and synergistic impacts of introduction of a variety of contaminants into San Francisco bay

The soil and ground water at the Ballpark and South of Channel parking site is grossly contaminated with heavy metals, petroleum and hazardous wastes. Drainage of these contaminants into the San Francisco Bay as well as resuspension of toxic sediment will have significant impacts on the water quality and habitat for aquatic and bird life. Ballpark construction and operation will expose storm water run off to high levels of heavy metals, pesticides and petroleum compounds (p. III.171). Toxins including, but not limited to, copper, mercury, nickel, silver, total cyanide and ammonia, dissolved in the shallow ground water at the ballpark site have been demonstrated to migrate to the China Basin Channel and subsequently to the San Francisco Bay. Toxins often relate to one another, having a synergistic effect. Thus, the contaminants entering the Bay cannot only be analyzed based upon each of their individual impacts. The hazardous substances must be considered as a whole system of contaminants entering the Bay's aquatic ecology. The DEIR fails to analyze the cumulative and synergistic impact of a multiplicity of contaminants entering the Bay's aquatic ecology through resuspension of contaminated sediment and storm water run off, and ground water discharge.

Similarly, the DEIR must consider the combined impact of pollution from all areas of the Ballpark and parking area, construction discharges, parking lot discharges, bypasses, sewer overflows, contaminated ground water discharges and increased litter as a whole and not simply as a collection of individual impacts. The DEIR fails to analyze the impact of multiple contamination sources as a whole, on the San Francisco Bay. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

Potential adverse effects to aquatic life in the Channel were evaluated with respect to the groundwater discharge because groundwater is the only potential exposure pathway that would exist under existing, construction and proposed ballpark use conditions. As discussed on pp. III.161 - III.162 of the EIR, the results of the risk evaluation did not indicate

unacceptable risks to aquatic life from groundwater discharges to the Channel. The contributions of chemicals of potential ecological concern (COPECs) to the Channel through wind-blown dust and storm water runoff, it they occur, are expected to be 1) controlled under the *Soil Management Plan* prepared for the site and under the Storm Water Pollution Prevention Plan required by the RWQCB; 2) of short duration; and 3) infrequent. With storm water and dust control programs in place, it is anticipated that only very small soil particles could be discharged to the Channel from the site, except under extremely severe storm conditions. Small particles discharged to the Channel are likely to be dispersed by the tide and significant accumulation of sediment with potentially hazardous chemical concentrations is unlikely. In addition, although the possibility exists that an additive effect could result from simultaneous exposure to multiple chemicals of potential ecological concern (COPECs), current practice is to evaluate COPEC risks individually using conservative water quality criteria comparisons in screening-level ecological risk evaluations.

Also noted is that the ecological risk assessment used aquatic toxicity criteria to evaluate migration of chemical-containing groundwater to the Channel; therefore, demonstrated exposure levels for non-human organisms were considered and evaluated. Bird life was not included in the risk evaluation because birds would not be submerged in the Channel for the majority of their lives next to areas where groundwater discharges into the Channel, as would aquatic organisms in the Channel. Therefore, dermal exposure to the birds was not considered a significant exposure pathway. Birds ingesting aquatic organisms affected by chemicals from the site would be extremely difficult to analyze because the effects of the site and the effects of the entire Channel and Bay system would first need to be separated, rendering such an analysis largely infeasible.

WATER QUALITY AND AQUATIC ECOLOGY

Water Quality of China Basin Channel

Comments

China Basin Channel. The EIR ignores the fact that this important waterway exists and the environmental impacts of the ballpark development and its infrastructure on this channel. (Andy Katz, San Francisco Tomorrow Waterfront Committee)

I just ask that you please look at those issues very seriously. People fish in the water of the bay. Boaters are very concerned, and we are all concerned about the water quality there and it gets properly addressed. (Leslie Caplan, Baykeeper)

Response

The water quality and aquatic ecology of China Basin Channel are the primary focus in the EIR's Water Quality and Aquatic Ecology section because the Channel forms the southern boundary of the ballpark site. The EIR addresses many aspects of the Channel, such as its water quality, sediment quality, aquatic habitat, and biota (pp. III.168 - III.173 of the EIR). The EIR identifies the potential impacts of ballpark construction and operation on China Basin Channel, which include increased sedimentation in the Channel from ballpark construction (pp. IV.306 - IV.311 of the EIR); turbidity in the Channel from tugboat operations and from pile driving (pp. IV.311 - IV.312 and pp. IV.319 - IV.320); accidental spills into the Channel (pp. IV.312 - IV.313); resuspension of existing contaminated benthic sediments (pp. IV.313); various water quality effects in the Channel resulting from repairs on the bulkhead (pp. IV.314 - IV.319); disruption of aquatic wildlife in the Channel (p. IV.320); potential migration into the Channel of groundwater contamination (pp. IV.326 - IV.327); and litter in the Channel (pp. IV.327 - IV.328).

As discussed on p. IV.313 of the EIR, bioaccumulation of contaminants in organisms such as fish continues to be a problem in the Bay, and the project may contribute to the problem by resuspending bottom sediments that are contaminated. Resuspension could occur during placement of minor fill for the new connecting pier and throughout the construction phase

from tugboat propwash. Mitigation measures for the project to minimize resuspension of contaminated sediment include using shallow-draft tugboats and operating them at slower speeds (p. V.66).

Comment

I also have a short comment from Bob Isaacson. He had to leave. He says: The ballpark will have a negative impact on the tidal ecology in Mission Creek beyond that noted in the draft EIR due to construction litter, run off, and sewage, direct and indirect, and from other causes, particularly increased human contact. These impacts must be mitigated. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

Response

Litter from construction would be addressed in the Storm Water Pollution Prevention Plan (SWPPP) that the Regional Water Quality Control Board (RWQCB) requires for the construction phase of this project. The SWPPP would include Best Management Practices describing how construction debris and litter would be prevented from entering the Bay and Channel. The SWPPP also would include measures to minimize erosion and sedimentation of the construction site by storm water runoff. Storm water on the completed site would be fully captured by the collection system so no storm water would run off into the Bay or Channel without treatment. In addition, no sewage from the ballpark would be released into the Channel because all sanitary wastewater would be fully captured and would be discharged into the City's combined sewer collection system for treatment.

Increased human contact with the water of the Channel could have effects on tidal ecology. However, China Basin Channel is already heavily trafficked by tugboats operating at Pier 46B (the site of the ballpark), pleasure craft traveling in and out of the Channel, and houseboats in the Channel, and is crossed by automobiles traveling over the Lefty O'Doul and Peter Maloney Bridges. There is no beach or convenient access to the water, so it is unlikely that ballpark patrons would choose to swim or wade in the Channel. Therefore, increased human activity in the form of larger crowds of pedestrians probably would not

impose impacts on tidal ecology or pose hazards to public health that are substantially different than the impacts of existing traffic in the Channel.

Comment

The DEIR indicates that raw sewage is diluted at a 10:1 ratio by rainwater. However, this estimate is questionable as waters in China Basin Channel are very shallow. "When overflows occur, chemical concentrations in surface waters at the mouth of China Basin Channel reflect the chemical concentrations in the overflow discharge water," (p. III.169) suggesting very little dilution. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

The dilution referred to in the EIR occurs when rainwater is mixed with raw sewage inside the sewer system. It is estimated that the dilution is about 10 parts of rainwater to 1 part of sewage. If the combined flows result in overflow discharges to the Channel, the water quality at the surface of the Channel generally reflects the water quality of the diluted (10:1) combined rainwater and sewage.

Comment

III.168 states that "China Basin Channel is...the site of berths for...25 pleasure craft." This number is incorrect. There are 34 berths available for pleasure craft (one berth is reserved for a guest berth), and since multiple occupancy of berths is allowed for small boats, there are currently about 46 pleasure craft in those berths, most of which depend on bridge openings. (Corinne Woods)

Response

The Port of San Francisco reports that 20 houseboats and 25 pleasure boats have permits in China Basin Channel.[44] Therefore, the numbers presented are accurate as reported in the EIR.

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44. Paul Osmundson, Port of San Francisco, telephone conversation with EIP Associates, May 30, 1997.

Wildlife Habitat

Comments

Lack of proposed mitigation for damage to the habitat in China Basin Channel and upstream Mission Creek. There will be extensive negative impacts on the fish and wading birds due to increased people contact, litter, sediment, drainage from construction and from the parking lots, yet no mitigation is proposed. To say that other foraging sites exist is not an adequate response to the loss of habitat value here...

The earlier Mission Bay EIR acknowledged impacts to the Tidal Ecology of Mission Creek as a result of similar uses. These impacts should be acknowledged in the Ballpark EIR and mitigation proposed. (Bob Isaacson, President, Mission Creek Conservancy)

We have included with this letter supportive documentation that proves that there is substantial wildlife habitat provided by the Channel. This documentation is in the form of a bird census of the Channel. One of our organization's most competent birders, Alan Hopkins, recorded the presence of 55 bird species in China Basin Channel during 20 census dates in 1987/88.

The high numbers for grebes, cormorants, wading birds such as the Black-crowned Night Heron, and fish eating ducks such as Greater Scaup and Surf Scoters all suggest substantial feeding efforts. Since these birds are fish eaters one may assume that the Channel does indeed provide important fish habitat.

Harbor seals have been seen in the Channel as have California Brown Pelicans.

All of this data leads to the inescapable conclusion that the China Basin Channel does indeed provide significant wildlife habitat to fish and birds.

The previous DEIR performed for this site, the Mission Bay EIR, recognized wildlife habitat in the Channel. The EIR also recognized that the proposed project would inflict significant impacts to the wildlife using the Channel and as a result the alternative chosen by the City for that EIR was one which mitigated those impacts through the intended creation of 11.5 acres of wetlands at the mouth of the Channel.

We believe the City is obligated to admit to the impacts recognized in [the Mission Bay] Environmental Impact Report. These impacts include increased public usage of the Channel shoreline which would result in increased noise and human disturbance of the wildlife leading to the abandonment of the Channel by sensitive wildlife species, such as herons, egrets, and most duck species.

Recognizing that the site does indeed provide significant wildlife habitat and that the habitat value will be significantly impaired by the project under discussion (the ballpark will

undoubtedly lead to increase disturbance of wildlife with increased numbers of people in the area), we urge the City to require mitigation for the impacts to the wildlife of China Basin Channel.

Such mitigation could include the creation of wetlands, as required in the previous EIR, and increased buffers around the Channel edge. (Arthur Feinstein, Executive Director, Golden Gate Audubon Society)

Response

The project would not result in a loss of habitat. The project does not propose significant changes to the Channel, such as filling or dredging portions of the Channel or building additional crossings over the Channel. The project would involve temporary in- and near-water construction activities as analyzed in the EIR, and, as described on p. IV.313 and pp. IV.319 - IV.320 of the EIR, a new connecting pier would require minor fill associated with the placement of about 16 precast concrete piles, which would add long-term spawning habitat for the Pacific herring. Foraging habitat for a small number of wading birds (herons and egrets) is available on the southern side of the Channel, which is comprised of a rip-rap wall and limited shoal areas. The proposal for dedicated parking areas south of the Channel does not include changes or alterations to the Channel edges. The northern side of China Basin Channel at the ballpark site is presently a dock area occupied by commercial marine towboat and seasonal commercial fishing enterprises, and does not support foraging activity.

The Channel provides opportunities for wildlife to forage, but the existing aquatic habitat in the Channel has limited fishery and wildlife value. Assessments of the benthic (bottom-dwelling) community show low species diversity, productivity, and habitat value compared to that of the open Bay.[45] Similarly, studies of the fish population near the Channel exhibit low levels of species diversity and abundance. Reasons for the low habitat values are that the Channel is a waterway that receives the City's combined sewer overflows during heavy rainstorms, and it occurs in a highly urbanized setting. The fish and other wildlife occurring

45. City and County of San Francisco, Department of City Planning, *Mission Bay Environmental Impact Report*, Volume Two, Technical Analyses, SCH No. 86070113, p. VI.M.4. *A copy of this report is on file for public review at the Office of Environmental Review, Planning Department, 1660 Mission Street, San Francisco.*

in the Channel are pollution-tolerant species that do not depend on pristine water quality conditions for survival. Water quality in the Channel during dry weather would be higher than during occurrences of overflows, and might then be more attractive to fish and wildlife. The habitat type offered in the Channel, primarily open water providing feeding and resting (but not breeding) habitat, is not substantially different from other widely available habitat types in the Bay. This type of habitat is widespread throughout the Bay and is not a limiting factor for the viability of any fish or wildlife population. The previously proposed Mission Bay project referred to by commentors potentially included dredging the Channel and reconfiguring the edges of the Channel with hard-edge treatments such as decking and gabions. Such activities are not proposed in conjunction with the proposed ballpark, and are not needed to mitigate potential impacts of the project.

The ballpark is in an area that has little remaining natural shoreline. The wildlife inhabiting this area have adapted to the urban environment and to the associated noise and human disturbances of this area. Increased numbers of people in the vicinity of China Basin Channel would not significantly impact wildlife use. Ballpark activities would be intermittent and would occur primarily in the summer when bird species diversity is lowest. Most of the birds associated with the Channel habitats are species that winter here. The human activities associated with operations of the ballpark would be isolated from aquatic habitats in the Channel, occurring within the ballpark or on bridges and walkways above the Channel. The human activities involved in construction and attendance at ballpark events may affect fish populations indirectly; those activities are analyzed in the EIR as the construction and operation effects of the ballpark, and mitigation measures are provided for significant impacts. Except for those activities, operation of the ballpark would involve no in-water activities that would constitute more of a disturbance to wildlife than marine tow-boat operations and seasonal commercial fishing operations presently ongoing at Pier 46B on the north side of the Channel. Wildlife that potentially could be affected by construction activities would include sea lions and harbor seals. Disturbance to these protected marine mammal species is considered harassment under the federal Marine Mammal Protection Act

and is strictly prohibited. As discussed on p. IV.320, no disturbance is expected from tugboat and barge operations during construction.

Litter impacts to wildlife are discussed on pp. IV.327 - IV.328 of the EIR, and mitigation measures to control litter in areas along China Basin Channel and the Bay are described on pp. V.69 - V.70 of the EIR. The mitigation measure proposes that trash receptacles be conveniently placed and regularly emptied; signs and warnings posted to encourage proper disposal of litter; and regular maintenance be performed to remove litter from the Channel surface.

The effects of sedimentation on the aquatic habitat are described in the Water Quality and Aquatic Ecology subsections entitled "Sedimentation From Storm Water Runoff" (pp. IV.306 - IV.311 of the EIR); "Turbidity From Barge and Tugboat Activity" (pp. IV.311 - IV.312); "Resuspension of Contaminated Sediment" (p. IV.313); and "Turbidity Impacts From Pile driving" (pp. IV.319 - IV.320). The subsection entitled "Sedimentation From Storm Water Runoff" (pp. IV.306 - IV.311) addresses drainage from construction areas and describes how implementation of the required SWPPP would prevent or minimize pollutants from entering the Channel and affecting aquatic organisms. As noted on p. V.70 of the EIR, design of the dedicated ballpark parking lots south of the Channel would include drainage improvements such that all storm water runoff over the parking lots would be collected in the City's combined sewer system for transport to the Southeast Water Pollution Control Plant for treatment prior to discharge. Therefore, potential impacts to habitat and wildlife would be mitigated by the measures identified in the EIR, and no additional measures are warranted for the project.

Birds and Aquatic Biota

Comments

Insufficient study of the aquatic ecology to provide a basis for assessment of habitat value and of impacts to it, as required by CEQA. The EIR at Page III.171 *Biota of China Basin*

Channel, states: "...no data are available on fishes in China Basin Channel..." then concludes that there are fish at the mouth of the channel due to the presence of wading birds.

Shorebirds have foraged in the upper reaches of the channel for the past fifteen years at least, as evidenced by the enclosed *Mission Creek Channel Bird List* dated March 1988. In addition, we have certain knowledge of many varieties of fish in the upper reaches of Mission Creek, including spawning herring in their season. (Bob Isaacson, President, Mission Creek Conservancy)

The area that [Alan Hopkins has] included in the census of Mission Creek Channel extends from the terminus of the channel at 7th Street to the mouth of the channel at the south east tip of the South Beach Marina. The narrow strip of land and foliage that runs along the southern edge of the channel is also included. High flying birds that showed no apparent interest in the area were not counted.

In the list [Alan Hopkins has] included with each species the first sighting date, the number of sightings, and the highest number of individuals sighted and the date for that sighting. It should be noted that extreme population fluctuations occur and that high numbers do not reflect a resident population.

This report reviews twenty census dates taken approximately weekly from September 29, 1987 to February 26, 1988. (Submitted by Bob Isaacson, Mission Creek Conservancy; Arthur Feinstein, Golden Gate Audubon Society)

MISSION CREEK CHANNEL BIRD LIST
September 29, 1987 - February 26, 1988

Species	First Sighted	No. Sightings	High Count, [date]
Common Loon	12/6	4	2,12/6
Red-throated Loon	11/15	9	4,1/30
Western Grebe	11/1	16	26,2/26
Clark's Grebe	1/3	3	1
Horned Grebe	11/15	8	4,2/21
Pied-billed Grebe	11/1	14	2,11/1
Brown Pelican	9/26	12	21,12/12
Double-crested Cormorant	9/26	17	36,12/12
Brandt's Cormorant	11/1	9	6,12/12
Pelagic Cormorant	11/1	10	2,11/28
Black-crowned Night-Heron	9/26	17	17,12/20
Snowy Egret	9/26	5	2,11/28
Great Egret	9/26	14	3,12/20
Great Blue Heron	9/26	8	2,11/28

Species	First Sighted	No. Sightings	High Count, [date]
Ruddy Duck	1/23	2	1
Greater Scaup	12/6	8	50,1/30
Lesser Scaup	12/12	5	7,1/3
Surf Scoter	11/28	10	1240,1/30
Barrow's Goldeneye	1/23	3	6,2/7
Common Goldeneye	12/6	7	10,12/6
Buffelhead	12/12	4	3,12/20
Killdeer	10/10	8	3,10/10
Black-bellied Plover	12/20	2	1
Spotted Sandpiper	11/1	11	2,1/10
Sanderling	11/28	8	150,1/30
Least Sandpiper	1/10	5	23,1/23
Heerman's Gull	9/26	1	3
Bonaparte's Gull	12/6	1	1
Ring-billed Gull	11/1	6	4,11/1
Mew Gull	11/8	15	1375,12/12
Herring Gull	12/12	2	2,2/7
California Gull	9/26	18	18,12/12
Thayer's Gull	1/10	1	3
Western Gull	9/26	20	565,12/12
Glaucous-winged Gull	10/10	15	825,12/12
Forster's Tern	9/26	4	2,9/26
Rock Dove	9/26	20	57,11/5
Mourning Dove	10/10	6	5,10/10
Budgerigar	1/23	1	2
Belted Kingfisher	10/18	10	3,10/18
Black Phoebe	11/1	9	1
American Crow	11/8	1	1
Common Raven	10/10	3	1
Northern Mockingbird	2/21	1	1
European Starling	10/10	19	370,1/23
Yellow-rumped Warbler	11/8	16	5,12/12

Species	First Sighted	No. Sightings	High Count, [date]
Palm Warbler	1/10	3	2,1/23
White-crowned Sparrow	10/18	13	4,11/1
Golden-crowned Sparrow	11/1	1	1
Western Meadowlark	12/12	4	2,1/23
Brewer's Blackbird	11/1	1	2
House Sparrow	10/18	8	35,1/30
Pine Siskin	11/8	1	1
American Goldfinch	1/23	1	1
House Finch	10/10	14	17,11/8
55 Species Total			

Source: Hopkins, Alan S., *Mission Creek Channel Bird List*, September 29, 1987 - February 26, 1988, March 6,1988.

Response

The statement in the first full paragraph on p. III.172 of the EIR needs clarification. It was not intended to suggest that the Channel does not support any fish life. The statement identifies that no formal studies of fishes in China Basin Channel have been conducted. The EIR discussed that since foraging wading birds were present in the Channel, fishes were, in all likelihood, also present. A similar conclusion was reached based upon observations of harbor seals and California sea lions in the mouth of the Channel. The EIR acknowledged that fish occur in the Channel, with highest numbers near the mouth. In previous surveys, a few individuals of Pacific herring, shiner surfperch, Northern anchovy, and speckled sanddabs were found during trawls performed in the Channel upstream of the Peter Maloney Bridge.[46] This area is nearly devoid of benthic organisms, however, and therefore, does not provide foraging habitat for bottom-feeding fish species. The following revision has been

46. City and County of San Francisco, Department of City Planning, *Mission Bay Environmental Impact Report*, Volume Two, Technical Analyses, SCH No. 86070113, p. VI.M.5. *A copy of this report is on file for public review at the Office of Environmental Review, Planning Department, 1660 Mission Street, San Francisco.*

made to the first sentence of the first full paragraph on p. III.172 of the EIR, and a second sentence has been added:

> **Although no extensive data ~~are available on~~ collection has been conducted for fishes in China Basin Channel, observations of wading birds (such as the common egret) and diving birds (such as the double-crested cormorant) in the vicinity of the mouth of the Channel (from the eastern end of Pier 46B to slightly west of the Lefty O'Doul Bridge) suggest the presence of fish in the waters at the mouth of China Basin Channel. Small numbers of fish occur at least intermittently in the upper portions of the Channel.**

The presence of shorebirds (as opposed to wading birds) in China Basin Channel does not necessarily indicate an abundance of fish. Many shorebirds such as willets, curlews, sandpipers, avocets and the like, feed preferentially on benthic organisms rather than fishes. The many varieties of fishes that have been reported in the western reaches of China Basin Channel would be unaffected by construction and operation of the ballpark because they are far removed from sites where construction activity would occur. Species of fish that occur in the mouth of China Basin Channel, particularly the Pacific herring, could be protected by mitigation measures discussed on pp. V.66 - V.68 of the EIR.

The bird list of sightings from September 29, 1987 to February 26, 1988 provides good information and was referenced in the Initial Study on p. A.30 of the EIR. The presence of sensitive species such as California brown pelicans was discussed in the EIR. However, since it was determined that the project would not have significant impacts on these species, a detailed inventory and analysis was not conducted.

Comment

We believe that this DEIR grossly understates the wildlife values (biota) to be found at Mission Creek or China Basin Channel as it is called in the DEIR.

On page III.171 "Biota of China Basin Channel," we find two contradictory statements. First that "recent studies...demonstrate that the biota of the western (upstream) portion of the China Basin Channel are nearly completely depleted..." Second there is a statement that, "No recent surveys of the biota have been performed for the Channel."

The DEIR does then state that the fact that there are wading birds and diving birds in the channel "suggest[s] the presence of fish in the waters at the mouth of China Basin Channel." We believe that the first statement ("recent studies...") Should be deleted or modified to recognize the fact that there is indeed substantial wildlife present in the Channel. (Arthur Feinstein, Executive Director, Golden Gate Audubon Society)

Response

The last paragraph on p. III.171 of the EIR was inaccurately worded. The conclusion that biota in the upstream portion of the Channel are nearly depleted was based on a sediment sampling effort by the RWQCB in China Basin Channel, which does not provide statistically significant data. This statement is an observation rather than a confirmed fact. Therefore, the following revision has been made to the last paragraph on p. III.171 of the EIR:

> ~~**The recent surveys of China Basin Channel by the RWQCB demonstrate that the biota of the western (upstream) portion of China Basin Channel are nearly depleted due to the high concentrations of ammonia and sulfides.**~~ **No recent surveys of the biota have been performed for the Channel. Past studies of the benthic community and fish population of upper China Basin Channel indicated reduced numbers and species, with a predominance of mollusks and polychaetes indicating stress from pollution. Surveys of similar areas throughout San Francisco Bay ~~suggest that~~ are consistent with these data. The biota in the mouth of the Channel ~~may~~ include moderate-to-dense populations of pollution-tolerant species such as the amphipod *Ampelisca,* marine worms, and a variety of small clams and snails. ~~The sediment quality characteristics of the western Channel suggest that the biota of that region would be primarily small populations of pollution-resistant oligochaete worms and few other species.~~ The fish community at the mouth of the Channel is likely to contain a more diverse and abundant fish community, more representative of the Bay itself.**

This revision does not change the conclusions of the EIR.

Comments

Please be aware of the impact on the marine environment when planning the new baseball stadium to be built on the San Francisco China Basin waterfront. Fish, marine life and the marine community's concerns must be also addressed. (Dean Anderson, President, Grand Marina)

B. The DEIR fails to analyze the cumulative impacts to aquatic and bird communities from contaminants introduced to the low end of the food chain.

Bioaccumulation of toxins occurs when organisms on the low end of the food chain are exposed to hazardous substances. Contaminated storm water run off, as well as resuspension of toxic sediments by tugboats, will increase low end organisms' exposure to hazardous contaminants, creating increased toxicity all the way up the food chain. Affected organisms include protected species, including Sea Lions and Pelicans. The DEIR must include a thorough analysis of the impact of increased exposure to hazardous substances via suspension of sediment, storm water run off and waste water overflows. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

The EIR addresses the ballpark's effects on fish and marine life. Each subsection in Water Quality and Aquatic Ecology identifies the specific effects that construction and operation of the ballpark would have on water quality, and describes how the effects would occur. Each effect is then examined for how changes in water quality would affect the aquatic ecology. For example, construction of the ballpark involves the use of tugboats that, due to the size and speed at which their propellers operate, may cause contaminated sediments at the bottom of the Channel to be resuspended in the water column. The effect on the Channel's water quality is that contaminants could re-dissolve and could increase the concentrations of contaminants and potentially toxic substances in water, which could then bioaccumulate in aquatic organisms. These effects are minimized by controlling resuspension of bottom sediments. Required mitigations for the project include using shallow-draft tugboats during construction, and operating them at minimum speeds. These mitigations control sediment resuspension at its source. However, the mitigations would not prevent bioaccumulation of contaminants from continuing. Existing sediment-bound contaminants and continued additions of contaminants from existing sewer overflows will influence bioaccumulation in China Basin Channel, but this is not an impact of the proposed project. Please see Land Use, Land Use Impacts on South of Channel Uses for further responses regarding maritime uses in the area south of the Channel.

Pacific Herring

Comments

Actually, there was one surprise. There is some fish that is going to have its love life interrupted, and I understand that the Giants have agreed to hire a marine biologist to make sure this fish has its day or night or whatever. (Penelope DePaoli)

Furthermore, the San Francisco Bay is already in an environmental state of decline. We need to consider ways to keep litter and other garbage from the use and construction of the ballpark out of the bay. The herring fisheries which will be negatively impacted need to be protected from the ballpark. (Mike Hempel)

The annual herring spawn in the China Basin area is an integral part of the San Francisco Bay ecology and no measures outlined in this report will mitigate the damage that will be done to our ecological system with the loss of the herring spawn. (Mark Miner)

[Impact on the South Beach marina, including] impact on the herring fisheries [must be considered and minimized]. (Abigail A. Grafton, M.A., M.F.C.C.)

V. The DEIR identifies, but fails to analyze adequate mitigation for interference with Pacific Herring spawning.

The DEIR acknowledges that pile driving during Pacific herring spawning season will have degrading effects on the Pacific herring spawning. "During pile driving sediments would be disturbed, producing a short-term increase in turbidity. Thus, pile driving could cause deposition of sediment that could be injurious to Pacific herring eggs, if it occurred during the spawning season" (p. IV.320). As, mitigation, the DEIR identifies, monitoring by an on-site biologist or qualified staff person and cessation of tugboat use when herring spawning is detected within 200 meters of tugboat berthing areas (p. V. 66-67). This measure fails to address the impact of the resuspension of contaminants by tugboat related turbidity on herring spawning.

Pile driving will inevitably interrupt herring spawning. Cessation of pile driving during herring spawning season, the only adequate mitigation under the circumstances, has become common practice in the Bay area. The DEIR must analyze the impact of this and the other proposed mitigation measures, including the impact of daily monitoring by a biologist. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

As noted on p. III.172, the EIR recognizes the value of the Pacific herring to the economy of the Bay Area. The Pacific herring fishery is one of the top three fisheries in the state

resulting in revenues to fishermen up to about $21.2 million). If wholesale and retail resale values are included, the total commercial value of the fishery is much higher.[47]

It is expected that no loss of spawning habitat for the Pacific herring would occur if the mitigations described on pp. V.66 - V.71 of the EIR were implemented. Two of those measures directly address the protection of spawning habitat ("Monitoring of Pacific Herring Spawning" and "Silt Curtain for Sub-marine Pile-Driving and Bulkhead Repair"). Both require that a biologist monitor the area if and when tugboats are scheduled for operation or when a silt curtain is proposed for removal during the spawning season, and measures are specified in cases when spawning activity is detected. The comment does not address why these measures would be insufficient.

As discussed on p. IV.313 of the EIR, resuspension of contaminated sediments would affect any aquatic organisms, inclusive of the Pacific herring. The mitigations described on pp. V.66 - V.68 for other sedimentation and turbidity effects would also protect all aquatic organisms, including the Pacific herring. These mitigations include the use of shallow-draft tugboats operated at minimum speeds to minimize sediment resuspension.

A mitigation measure for turbidity caused by pile driving is included as part of the project and is described on pp. V.67 - V.68. Pile driving activities may occur at any time of year, but a silt curtain must be installed underwater around each pilot hole location prior to drilling the holes and driving the piles. A silt curtain is a mesh fabric that allows flow-through of water, but prevents passage of sediment and other suspended material. The silt curtain could only be removed during the spawning season if a biologist or other qualified individual were present to monitor spawning activity.

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47. Diana Watters, Associate Manager of Biology, Project Leader for Pacific Herring Research Project, California Department of Fish and Game, telephone conversation with EIP Associates, May 23, 1997.

Comment

I.54 first paragraph. If tugboat use and submarine pile driving for the new connecting pier are scheduled during the peak Pacific herring spawning season from December 1 to March 1 a biologist would be present. . .

Wouldn't it be more feasible to create a construction schedule that would avoid the spawning season altogether, rather than risk having the construction schedule disrupted? (San Francisco Tomorrow Waterfront Committee)

Response

Scheduling tugboat operations and pile driving activities to avoid the spawning season is not practical given the unpredictability of the annual spawning location. The actual site of Pacific herring spawning in San Francisco Bay changes from year-to-year, and may, in fact, occur at numerous locations around the Bay during the months that Pacific herring enter the Bay for spawning purposes. The mitigation measures included in the project would protect spawning activity.

Construction Runoff

A. The DEIR fails to adequately analyze the environmental impacts of significant amounts of contaminated storm water draining, directly and through sewer overflows, into the Bay during Ballpark construction.

Soil and ground water at the Ballpark site is heavily contaminated due to previous industrial uses of the site. Contaminants include, but are not limited to, high levels of lead, antimony, copper, mercury and above and under ground storage tanks. Site excavation will expose those contaminants to the open air. They will be blown into the Bay and washed directly into the Bay with storm water.

Storm water discharging directly into the Bay and Channel Basin would introduce enormous amounts of hazardous substances into the Bay. The DEIR must analyze the impact of this and of mitigating alternatives....

...The DEIR fails to adequately analyze the impact of the introduction of these contaminants on the Bay and its aquatic and bird life. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

Site excavation is to be conducted in two areas of limited extent. Dust from these excavations would be mitigated as described in the *Soil Management Plan*. Grading activities at the site could also generate dust and would be mitigated in accordance with the *Soil Management Plan* by keeping the site surface soils moist via spraying. The EIR also includes dust control mitigations for air quality maintenance (pp. V.63 - V.64). Therefore, exposure to chemicals by aquatic organisms or birds via dust being blown into the Bay would be minimal.

A SWPPP would be prepared in accordance with the required General Construction Activity Storm Water Permit (pp. IV.309 - IV.310). The SWPPP would present procedures to be followed to mitigate storm water runoff containing sediments from the site, including sediments that may contain chemicals, from entering the Bay. An example given on p. IV.310 of the EIR is the installation of filter fences around the construction site to remove sediment. With regard to chemicals dissolved in storm water that may run off the site after filtration, groundwater samples collected from the site did not contain elevated concentrations of the metals listed in the comment as being contaminants (e.g., lead, antimony, copper, or mercury) indicating that these chemicals are not readily solubilizing into water at the site (pp. III.177 - III.178). Therefore, it would not be anticipated that storm water runoff would contain elevated concentrations of dissolved metals from the sediments at the site. Aquatic or bird life exposure to chemicals via storm water to the Bay would not be significant if a SWPPP is implemented in accordance with the general permit.

Toxic Spills

Comment

The DEIR identifies potential spills of toxic substances such as fuels, lubricants, solvents, chemicals, paints, and other substances as posing a risk to protected and endangered species of California sea lions, California brown pelicans, Pacific herring and others, but the specific impacts and mitigation measures are not analyzed. Proposed compliance with an undefined and nonexistent Spill Contingency Plan fails to provide the public or public agencies with any

information with which to evaluate the environmental impact of the project and does not satisfy the CEQA requirements for a DEIR. The "Prevention of Toxic Spills from Pier 46B Discharge Pipe," is a better example of a mitigation procedure, but applies only to the pipe and ignores the potential impact of failure to follow the procedure or of a leak developing in the capping. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

Construction typically uses a variety of substances that are potentially toxic if spilled into waters. The EIR provides examples of the types of substances that would be used at the ballpark construction site (p. IV.312). As with anything accidental by nature, it is not possible to guarantee that spills will not occur, nor is it possible to provide specific measures for a contingency, in contrast to the specific steps to taken for a known hazard, such as the Pier 46B discharge pipe. While the best mitigation for spills is to prevent them from occurring, it is also necessary to have measures in place to control and contain a spill, and then to clean it up. As noted on pp. IV.309 - IV.310, the project is required to obtain a General Construction Activity Storm Water Permit. This permit is required by the state and administered by the RWQCB for construction sites larger that 5 acres. As a requirement of the permit, the project sponsor must prepare a SWPPP. A program to prevent, control, and cleanup spills typically is part of the SWPPP, which would be prepared in accordance with Best Management Practices.

Groundwater Movement

Comment

The DEIR fails to adequately address environmental impacts on San Francisco Bay of the interaction of altered gradients, dewatering and tides.

Due to its location adjacent to San Francisco Bay and China Basin Channel, the ground water underneath the Ballpark is subject to tidal influence (p. III.176). There is a strong probability that ground water will be pumped off site during excavation and construction of the Ballpark. Because the ground water and tidal flows affect each other in this area, any dewatering may increase communication between contaminated ground water and tidal inflows. These increased tidal flows are likely to disturb sediment and float out additional levels of contaminants as they leave the dewatered areas, particularly at the Berry Street

sewer. Although the DEIR states the Berry Street sewer "is proposed to be capped", it fails to analyze the impact of a failure to cap, or a leak developing in the cap (p. IV.327)

The DEIR fails to adequately analyze the impacts and management of dredging, grading, pumping, and dewatering and to analyze mitigation of those impacts generally and with specific regard to Berry Street. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

As described on p. III.176 of the EIR, tidal influence extends across the site, but is strongest south of the Berry Street sewer. As discussed on pp. IV.321 - IV.322 and IV.326 - IV.327 of the EIR, the Berry Street sewer is proposed to be capped and left in place, which would further limit the extent of tidal influence. The proposed "cap" is designed to increase the structural stability of that sewer (proposed for abandonment) beneath the ballpark site, not mitigate groundwater from entering the sewer. It may or may not block groundwater from entering the sewer. If groundwater enters the sewer following placement of the cap, it would be transported via the City collection system and treated at the Southeast Water Pollution Control Plant, as it is at the present time.

Further limitations on tidal influence would occur when loose soils behind the bulkhead are compacted for structural stability. Due to water displacement, dewatering would induce movement of Channel water into the soils south of Berry Street, as noted by the commentor, rather than induce additional groundwater migration out of the ballpark site into the Channel. Additionally, as discussed on p. IV.322 of the EIR, the RWQCB requires that groundwater be monitored during dewatering to determine whether contaminants are being mobilized. All monitoring data would be submitted to and reviewed by the RWQCB. The RWQCB would determine actions to be taken, if the data demonstrate that dewatering is affecting the extent of the existing contamination. Therefore, although dewatering would not necessarily mobilize contaminants, requirements are in place to monitor and mitigate potential effects of dewatering activities on the localized area of concentrated contaminants. The following has been added to p. V.71 of the EIR to include groundwater monitoring as a mitigation required

by the RWQCB. This is added to make the list of mitigation measures complete and is not a new measure:

> **Measure Included as Part of Project**
>
> **As a mandatory program, groundwater monitoring is not identified here as mitigation, although it would serve to control potential project impacts. In addition to the measures identified above, the project would be subject to groundwater monitoring at well point WP-06, as required by the Regional Water Quality Control Board (RWQCB), to monitor potential migration of contaminants located near WP-06 (see IV.J. Water Quality and Aquatic Ecology, pp. IV.321 - IV. 322).**
>
> **Prior to initiating dewatering activities in the area near well point WP-06, the project sponsor would have a groundwater monitoring point installed between well point WP-06 and the dewatering area. Existing groundwater quality data would be collected to establish baseline conditions, and subsequent sampling would be performed frequently, with monitoring reports submitted to the RWQCB.**

The following has been added at the end of the last paragraph on p. I.54 of the EIR:

> **During dewatering activities, the project sponsor would monitor the existing groundwater contamination conditions as required by the Regional Water Quality Control Board.**

As discussed on pp. IV.161 - IV.162 of the EIR, the ecological risk evaluation did not indicate unacceptable risks to aquatic life from groundwater discharges to the Channel. This evaluation did not incorporate the effects of dilution as the groundwater enters the tidally influenced Channel and therefore presents a conservative assessment of the potential impacts to aquatic organisms from groundwater at the site. The ecological risk assessment performed for the ballpark is also discussed in Contamination and Environmental Risk, Ecological Risk Assessment.

Pile Driving

Comment

There are several grave concerns and questions with respect to construction impacts... Pile driving - will there be reflected shock waves from pile driving resulting in sediment uplift in China Basin Channel? Will pile driving cause other effects such as slumping of channel edges? (Martin Fay, Rincon Point - South Beach CAC)

Response

As stated on p. V.67 of the EIR, silt curtains would be installed around sub-marine pile driving locations to prevent resuspended sediments from drifting away from the pile driving locations.

Vibrations from sub-marine and on-shore pile driving are damped naturally by the ground through which they pass. All vibrations die out completely within a few hundred feet of the source. The strongest vibrations die out within 5 to 15 ft. of the pile driving location, depending on the type of pile (concrete, steel, wood), the competence of the formation into which the pile is being driven (dense sediment, weathered rock, firm rock), and the medium through which the vibrations are traveling (rock, sediment, water). A critical factor in assessing the potential for vibration-caused damage is the distance from the source (the tip of the pile) to the area of concern. For slope-stability concerns, other critical factors are the degree and condition of the slopes being affected.

The vibrations from pile driving would not be sufficiently intense to cause damage to the steel bulkhead or the rock seawall, although vibrations would be felt at the bulkhead from driving the guide piles for the ferry landing and for the first and second row of foundation piles north of the bulkhead. The earthen south side of China Basin Channel is more than 700 ft. from the closest pile driving locations: much too far to be adversely affected, even though the medium of transmission (Bay Mud) is soft, saturated sediment. On the north side of the Channel, bottom slopes within about 200 ft. of the closest pile driving locations are between 1 and 2 percent: between 200 and 300 ft. from the closest pile driving locations slopes are

about 6 percent. These slopes might experience minor sloughing of surface sediment during pile driving (about as much as is produced by natural currents), but they are too shallow and too far from the vibration source to be subject to slumping or landsliding.[48]

Storm Water Permitting

Comments

The DEIR refers to two other possible mitigations: a storm water permit and an oil/water separator, but fails to adequately analyze the impacts of these mitigations.

The DEIR notes that a storm water permit would not be required for the Ballpark, because it is connected to the City's combined sewer system, but fails to address whether such a permit would be required for the South of Channel parking area. The DEIR fails to analyze the potential content of such a permit, its effects were it required and the impacts of compliance and noncompliance with the permit on San Francisco Bay...

B. The issuance of a construction permit does not mitigate the environmental impacts of contaminated storm water run off from the Ballpark and South of Channel parking area construction site.

Storm water from areas of the Ballpark site (p.IV. 308) and the parking area not connected to the City's sewer system runs off directly into San Francisco Bay. This storm water receives no treatment for the metals and hazardous contaminants before discharging into the Bay (p. III.166).

Adverse impacts to water quality and the aquatic ecology of China Basin Channel created by storm water run off during Ballpark construction identified in the DEIR (p.IV.306) include, but are not limited to:

> -uncontrolled storm water runoff carrying contaminated soil and sediment
> -particulate-laden waters entering China Basin Channel from the construction site would increase water turbidity, having devastating impacts on the suitability of the local habitat for benthic and sessile organism, Pacific herring spawning, algae, fish, "suspension-feeders" (p. VI. 306-307).
> -suspended material, especially during construction, would contain concentrated reduce the critical process of photosynthesis and increase the accumulation of toxins in the biota (p. V.307)

48. Mike Brightenstein, P.E., Moffatt & Nichol Engineers, telephone conversation with EIP Associates, May 13, 1997.

The DEIR suggests that the adverse environmental impacts on China Basin Channel and San Francisco Bay, are mitigated by the issuance of a General Construction Activity Storm Water Permit and its attendant Storm Water Pollution Prevention Plan (SWPPP) and sets forth "typical measures" contained in SWPPP's (p. IV.309). However, the fact that Ballpark construction requires a construction permit does not obviate the CEQA requirement that the EIR describe all environmental impacts of the proposed project's construction and operation. This is especially true where as here, the DEIR refers to construction permits which primarily address erosion, TSS, and turbidity, not hazardous waste control, and set only narrative, and not effluent limits on discharges. Thus, significant contaminants could be discharged into the Bay while still maintaining compliance with the procedural requirements of the construction permit (p.V.70, Erosion and Sedimentation Control).

The DEIR must describe and analyze any special measures required to control exposure of the hazardous waste, contaminated ground water and other toxins present at the site to storm water, contingency plans and potential impacts of discharges of pollutants to the Bay...

Finally, the DEIR notes that the Ballpark would not require a separate storm water permit because it is connected to the City's combined sewer system, but fails to analyze the content of the permit and the impact of compliance or noncompliance.

The DEIR must analyze the potential impacts to human health and aquatic life of storm water runoff on the Bay, how compliance and noncompliance with permits will mitigate or fail to mitigate those environmental impact and the impact of flawed or inadequate permits. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

As discussed on pp. III.166 and IV.309 - IV.310 of the EIR, coverage under the state's General Construction Storm Water Permit would be required for construction of the ballpark because a portion of the site could contribute storm water to China Basin Channel, and for the parking areas proposed south of the Channel. The ballpark would not be subject to separate storm water permitting requirements after construction because drainage (sewage plus storm water) from the entire site and the parking areas would be directed to the City's Southeast Water Pollution Control Plant for treatment. The treatment plant discharges wastewater under a separate individual National Pollutant Discharge Elimination System (NPDES) permit that allows discharge of combined flows from the City. Storm water from the ballpark and parking areas would be covered in that permit.

Compliance with the General Construction Activities Storm Water Permit requires not only that SWPPP be prepared, but that it be implemented. The RWQCB enforces the implementation of the SWPPP, and may impose significant penalties if permit conditions are violated. Current regulation does not currently have established numeric effluent limitations for storm water due to the diffuse nature of the sources of pollutants in storm water discharges and of the points of discharge, and because the methods of reducing pollutants in storm water discharges are in the development stage. Therefore, instead of numeric effluent limitations, SWPPPs use Best Management Practices for water quality control. Examples of Best Management Practices are given on pp. IV.309 - IV.310 of the EIR. Storm water runoff is also discussed in Water Quality and Aquatic Ecology, Birds and Aquatic Biota, and Construction Runoff.

Impacts on Capacity of Wastewater Treatment and Sewers

Comments

The EIR spends little time discussing the capacity of the S.E. Sewage Treatment Plant, other than to state the average flow in millions of gallons per day (MGD) is adequate as are the area's sewer and drain lines. Flows from the stadium, however, will be in terms of peak loads covering 3-6 hours.

Because of the high water table, there was a discussion of ballpark drainage, but I did not discover any provision for collecting runoff and pumping it into the City's system. (Silva B. Creg)

Currently, storm water run off from the ballpark site drains into one of two sewers along Berry Street, where it is combined with sanitary flows and pumped through transport/storage facilities to the Southeast Treatment Plant, treated and discharged into the Bay (p. III.166). During peak storm events, this system bypasses and/or overflows raw sewage and storm water into China Basin Channel.

The Southeast Plant itself already lacks the capacity to manage current flows of combined sanitary and storm water flows. At least 1,176 million gallons of sewage overflowed into the Bay in 1995-1996 (p.III.167). Overflows into the China Basin Channel through several outflow structures are allowed at an average of up to 10 overflows per outfall per year (National Pollutant Discharge Elimination System (NPDES) permits). Combined sewer overflows into China Basin Channel in fact, have occurred three time from a single overflow

structure in 1995-1996 (p. III.167). (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Some of the storm water from the Ballpark construction site will enter the City's combined sewer system. As previously noted, the drainage system is already insufficient for its current load. Drainage via City sewers and transport/storage facilities the Southeast Treatment Plant discharged at least 1,176 million gallons of pre-treated sewage overflow into the Bay in 1995-1996 (p.III.167). Thus, there is a strong likelihood that much of the contaminated storm water run off from the Giants construction site will reach the Bay untreated.

...C. Substantial amounts of raw sewage will be discharged into San Francisco Bay through treatment plant overflows as a result of increased sewage usage.

As noted above, San Francisco's combined sewer system already lacks the capacity to consistently transport and treat sanitary sewage and storm water run off without significant discharge of untreated overflow into San Francisco Bay.

Operation of the Ballpark, surrounding sports bars and related businesses will significantly increase the volume of sanitary waste water handled through the combined sewage system. In addition to the increased sanitary sewage, "[a]ll storm water on the future completed Ballpark site would drain into City sewers" (p.IV.308) including all the irrigation and storm water run off from the playing field contaminated with pesticides and fertilizers. The Ballpark project will increase the volume of both waste water and storm water draining to an already overloaded sewage system with an obvious increase contaminated overflows discharging directly into San Francisco Bay. The DEIR fails to identify and analyze the environmental impacts of the increased number of toilets flushing into the combined sewage system and the inability of the system to manage the additional volume generated by the Ballpark, sports bars and new business. Additionally, the DEIR fails to analyze the impact of the inevitable bypasses and overflows to San Francisco Bay resulting from increased usage.

D. The DEIR fails to discuss mitigation for potential discharges to San Francisco Bay, China Basin Channel resulting from increased flows in the City's combined sewage system.

The DEIR must not only analyze impacts of the Ballpark project, it must also identify and analyze measures to mitigate the impacts. Efforts to mitigate the overflow impact of increased flows of storm water and sanitary sewage resulting from the Ballpark project could include improving the sewage transport system in China Basin. This might be accomplished by the construction of larger sewage pipes, the building of additional and larger pump transfer stations and the construction of a Baker tank to hold drainage flows from the Ballpark during peak wet weather when bypasses are likely to occur.

The DEIR fails to adequately identify and analyze measures which might be taken to mitigate the impacts of increased storm water run off and sanitary sewage overflows into San Francisco Bay. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Page IV.323: Sewer back-ups are a frequent occurrence in the South Beach neighborhood. Would the additional demand created by the ballpark and/or changing a portion of the site's flows from eastward to westward to King Street and the Embarcadero contribute to further back-ups?

...Page V.70: The current sewer back-up problem in the South Beach neighborhood, including any contribution to that problem associated with the ballpark, must be thoroughly studied, and a solution developed prior to approval of the ballpark. (Steven L. Vettel, Residential Properties Group)

Other issues of concern [to the South Beach area] includ[e]... sewer back-ups... are nowhere analyzed... [T]here is no quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel).

Despite repeated comments on the Initial Study by South Beach residential property owners who requested discussion of sewer problems in that area, this issue was effectively eliminated from discussion in the EIR. The issue of sewage is treated as merely a relocation of sewer demand from Candlestick to the China Basin site. The issue of the sewers is very site specific and that aspect has been disregarded.

When the Redevelopment Agency did the environmental review for the South Beach Redevelopment Area, they basically dealt with the issue of wastewater as it related to the construction of the collection and transport facility along the Embarcadero which collects runoff during rainstorms to reduce overflows into the Bay. They then walked away from the problem of inadequate local sewers in the South Beach. This project, which makes a significant amendment to the South Beach Plan, cannot walk away from the sewer problems in its neighborhood.

The main sewer system running throughout South Beach is an old brick system which connects to the main line on the Embarcadero. That aged system has been overtaxed by the amount of sewage being generated in the new residential and commercial complexes in the area and appears to lack proper venting in the connectors. The new residential projects have had repeated sewage backups into their ground floors during storms, and sometimes to higher floors. Delancey Street has had to rip up and replace its lobby floor several times because of sewer backups, including once very recently. In addition to residents in these complexes, there are ground floor restaurants which are affected by these backups. The backups and obnoxious smells from this inadequate sewer system are creating an increasingly disastrous health problem for the residential area immediately adjacent to this project and well as a deteriorated quality of life for the residents and people walking down the sidewalks. This will now include people going to the ballpark.

Why this issue must be included and analyzed (1) Even if the ballpark itself reroutes its sewer demand so that not even a teaspoon of its sewage -- both during construction and after it is open -- enters the lines serving the rest of South Beach, the EIR must address the cumulative development peripheral to the ballpark that will not be routed into The Embarcadero/King Street sewer, e.g. the bars and restaurants and other facilities that are [part] of the growth-inducing impact of the ballpark. I would note that the new facilities in the expanded South Beach park supposedly will also re-reroute to the west. It is strange that the impacts of that complex which are supposedly "benign" are somehow included in this report, while others with a more determinedly negative effect don't make it into the EIR.

Given the information currently available, the EIR must assume that sewage from development on the peripheral blocks will go into the "regular" South Beach sewer system and worsen existing problems.

(2) If the problems of this sewer are not corrected before the ballpark opens, it is inevitable that they will have to be corrected after the ballpark opens. What that means is that the embarcadero and whatever other streets those lines go down will have to be torn up and will directly affect the ability to move people into and out of the ballpark. Delaying correction of this problem until after the ballpark opens would seem extremely unwise.

(3) Finally, if the ballpark had been open in China Basin this month, patrons walking to the games along the Embarcadero would have been confronted with the overwhelming smells from this decrepit sewer system. The statement that the ballpark operates in dry weather and thus would not be related to wet weather problems is incorrect. I had tickets to a ballgame last year that was rained out. The obnoxious smells, which make it impossible to use outdoor dining areas in South Beach, areas near the ballpark which would be patronized by persons attending games, as well as make it unpleasant to sit outside, are noticeable in both dry as well as wet weather.

...III.173 - Site Drainage: Again, problems with the existing sewer in the South Beach area, in particular the residential complexes, have been ignored here. This must be set out.

What guarantees are there that the sewer re-routing can be done in such a manner that absolutely no interference -- not even one teaspoon of sewage backflow to the rest of the system -- occurs during the re-routing. The ballpark has the potential to adversely affect the sewer system for the residential complexes if this is not handled correctly during construction.

When will the sewer on the park site be abandoned? What precautions will be taken to prevent disruption with the residences?

...IV.324 - Sewers: Please be very explicit about exactly how the redirection of the sewer lines is going to occur and how the residential neighborhood, already burdened with incredible sewer problems, will be protected from every bit of harm...[T]hese uses [new fast

food, bars and other retail in area] may also put increased demand on the overburdened sewer system. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page III.173, Sewers: The discussion of site drainage and the existing sewer system must include a discussion of the frequent sewer backups in the South Beach neighborhood, particularly at Delancey Street, Bayside Village and South Beach Marina Apartments. Flooding, foul odors and sewer cap blow-offs are all frequent occurrences during wet weather. (Steven L. Vettel, Residential Properties Group)

[T]here were some problems, significant problems, with the infrastructure around there, particularly with the backup, back flow of sewers into existing projects in the neighborhood. I know personally...the Delancey Street, two or three times a year for the last four or five years, has experienced a really serious back flow that sends water in force back into the buildings, blowing covers off of drains. They have had to replace floors several times there. We pointed that out and said please look at that and tell us what would the effect be...of this new facility on that situation. It is simply not addressed in the draft EIR. Again, I can't figure out why. It should have been. (Rick Mariano, Rincon Point South Beach Citizens Advisory Committee)

We were under construction with the Oriental Warehouse and we were told because of existing sewer problems essentially several times during the year the water would back up from the toilets and flood the units. This is a major impact, and is not addressed at all I don't believe in the EIR.

You can imagine you spend two, three, $400,000 for a home, and several times a year your toilets are going to overflow from a sewer back up. (Mike Gray)

The third thing is the sewers. The agency did not fix the sewers before the housing was built. These brand new housing units have sewer back ups several times a year. Delancey Street has ripped up its floor on the ground floor four times. They have had to redo their first floor. The other housing projects have similar problems. The sewer issue was scoped out of the EIR. Whether or not the Giants are able to re-route their sewer capacity is not the only issue. Because there is going to be increased demands on sewer capacity from the development immediately around the park, including all those bars which will have toilets and people are going to flush. (Sue Hestor)

...this document does not fully enough address the potential negative impact of additional sewer/rainwater flow upstream to the South Beach Marina Apartments, Delancey Street and Bayside Village projects which would be caused by the ballpark operation. These apartment buildings already suffer from yearly backflows which cause sewer water to rush into their buildings--in force--causing drain covers to blow off as high as the third floor in the Delancey Street building, for instance, and causing extensive water damage to those

buildings. This situation is not addressed in the Draft EIR, and no mitigation measures are identified in this regard. (Rick Mariano)

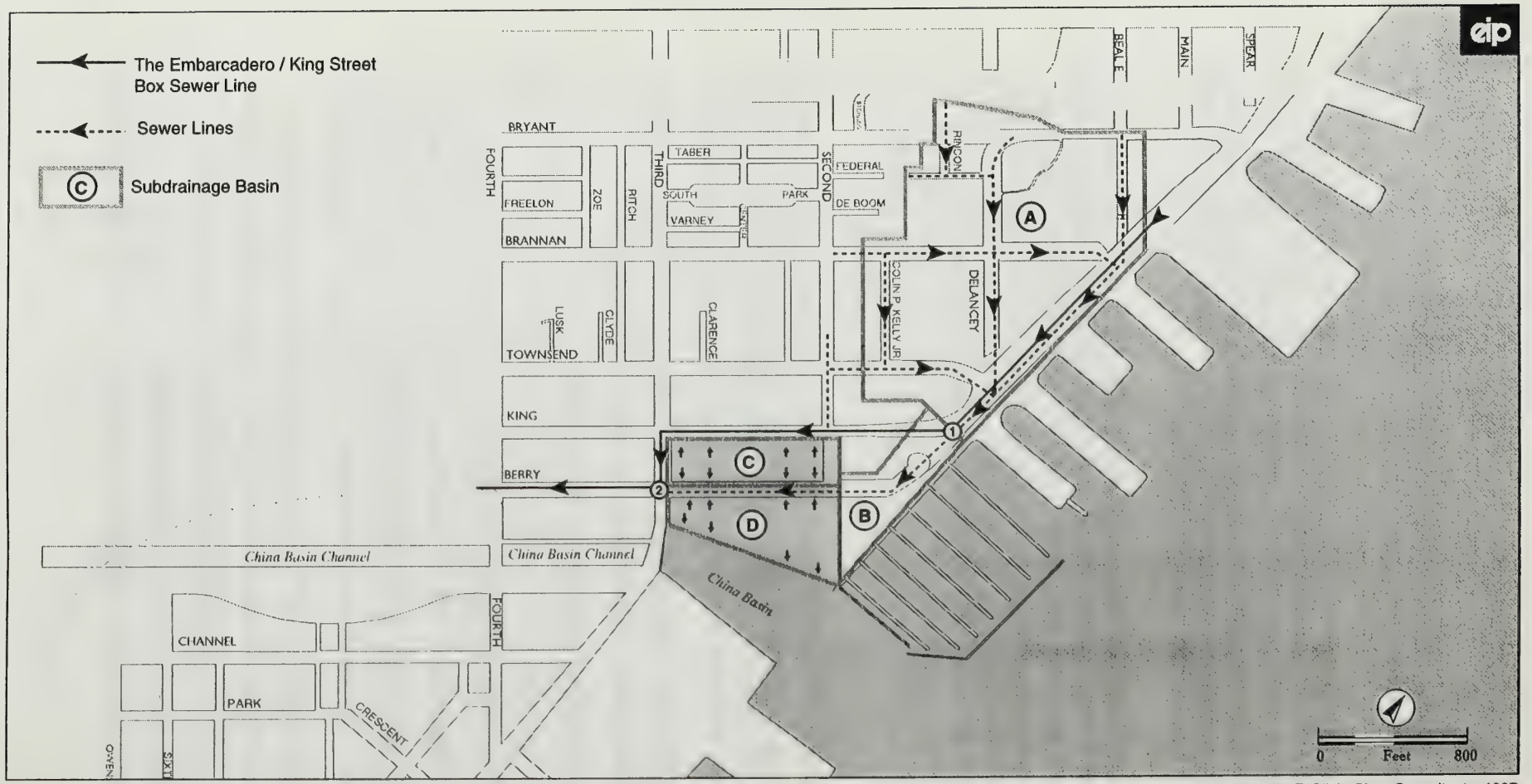
Major problems exist in the area with sewer back ups into newly constructed buildings. Sewer odors are a problem in the area. Abandoned sewer lines are also a problem. The proposed changes to the sewer system must be more clearly described and the impact of those changes must be analyzed, particularly with respect to existing and planned upstream users. A diagram showing the proposed sewer system and capacity analysis must be included in the DEIR. (Martin Fay, Rincon Point - South Beach CAC)

No discussion of the effects of this stadium on the sewer capacity of the neighborhood. Already a problem is the overflow and backup at the vent locations on the sidewalks in front of Bayside Village which result in a foul smell now. If the 50,000 plus people at the game (42,000 attendance, media, stadium workers, etc.) all use the toilet and they drain into the same system, what are the effects of this? Isn't there a need for additional infrastructure or improvements to the infrastructure in this regard? (Michael Karasik, Bayside Village Associates)

Response

As discussed in the Initial Study, pp. A.27 - A.28 of the EIR, wastewater from 3Com Park is treated at the Southeast Water Pollution Control Plant as would wastewater from the proposed ballpark. Wastewater use associated with games at the proposed ballpark would replace ballgame-associated wastewater from 3Com Park. Therefore, the differences in the volume of wastewater needing treatment are minimal and would have no effect on the treatment capacity of the Southeast Water Pollution Control Plant.

Additional detail on the existing drainage patterns is requested in the comment. A new figure has been added to the EIR as Figure III.J.1 to illustrate the existing drainage pattern and is reproduced on the next page. This figure shows the existing sewer configuration in the vicinity of the ballpark site. The sub-basins in the area that contribute local drainage to the sewers are indicated with an alphabetic letter. As shown, two sewers run in parallel along The Embarcadero: one is the Berry Street 2'-6" by 3'-9" pile-supported sewer that is described on p. III.173 of the EIR, and the other is the large-capacity Embarcadero/King Street storage box sewer described on p. III.174. As shown in the figure, the Berry Street sewer extends down The Embarcadero and continues through Point 1 to Berry Street, making



SOURCE: Olivia Chen Consultants, 1997

GIANTS BALLPARK

Figure III.J.1 (New) Wastewater Flow Pattern Before Sewer Re-Route

no connection with The Embarcadero/King Street box sewer until it reaches Third Street. As shown in Figure III.J.1, The Embarcadero/King Street sewer turns left from King Street onto Third Street, then right onto Berry Street, where it connects to the smaller Berry Street sewer at Point 2. The Embarcadero/King Street sewer basically collects drainage from the northeast quadrant of San Francisco. The direction of flow is southerly towards the Channel Pump Station which relays the flow to the Southeast Water Pollution Control Plant located near Islais Creek in the southeast part of the City.

The Berry Street sewer collects drainage from Area A (shown on Figure III.J.1), which includes the Bayside Village Apartments, Delancey Street Foundation, South Beach Marina Apartments, and the Steamboat Point Apartments. The Berry Street sewer also collects drainage from Area B, which includes a portion of South Beach Park, South Beach Harbor, and the Port properties at the east end of Berry Street. The flow contributed by Area B is minor, consisting of flow from the ILWU Building, the Harbormaster building, and a public toilet. Drainage from the ballpark site presently flows in four directions. The northerly part of Area C flows into King Street and discharges into The Embarcadero/King Street box sewer. Storm water on the southerly portion, approximately 1/3 of Area D, drains directly into China Basin Channel. (All sanitary wastewater on this area is collected and treated at the Southeast Water Pollution Control Plant prior to discharge.) The remaining area of the ballpark site drains into the Berry Street sewer. All flow in the Berry Street sewer passes into a junction box at Third Street (point 2) and flows by gravity to the west to the Channel Pump Station at Seventh Street. During peak storm flows, a weir at the junction box allows overflow through an outfall into the Channel at the Lefty O'Doul Bridge.

The text of the EIR is revised as follows to provide further clarification of the existing drainage pattern. The changes are provided to make the information in the EIR more complete, but do not change the conclusion in the EIR that the ballpark would not adversely affect sewer capacity. The seventh and eighth sentences of the second paragraph on p. III.173 of the EIR have been revised as follows, and a new graphic showing the sewer configuration has been added as Figure III.J.1 on p. III.173a:

As shown on Figure III.J.1, the sewer conveys sanitary sewage and storm drainage from an off-site area north of The Embarcadero and Townsend Street (Area A) to a junction structure at Third and Berry Streets, and continues west down Berry Street to the Channel Street Pump Station at point 2 Seventh ~~Sixth~~ Street ~~where it terminates~~. The Berry Street sewer also collects drainage from Area B, which includes a portion of South Beach Park, South Beach Harbor, and the Port properties at the east end of Berry Street. During peak storm events, excess flow from the Berry Street sewer overflows through ~~a~~ the junction box at Third and Berry Streets where it joins a 3-ft.-by-5-ft. brick sewer.

The third and fourth sentences in the first paragraph on p. III.174 of the EIR have been revised as follows:

The San Francisco Redevelopment Agency's (SFRA) planned South Beach Park project is adjacent to the ballpark site. If any excavation is involved as part of the South Beach Park project, the SFRA may re-route the upstream portions of the Berry Street sewer. Flows from Area A upstream of King Street and The Embarcadero will be diverted to The Embarcadero/King Street box sewer instead of continuing down the Berry Street sewer ~~to the Third Street sewer~~. The Embarcadero/King Street box sewer is a high-capacity 17.5-ft.-wide box sewer that is over 30 ft. deep at the intersection of The Embarcadero and King Street.

The first three sentences of the second paragraph on p. III.174 of the EIR have been revised as follows:

The ~~western one-third of the ballpark site~~ southern part of Area C and the northern part of Area D presently drains into the Berry Street sewer. The ~~remainder of the site~~ northern part of Area C drains ~~either~~ north to ~~sewers in King Street or west to the Third Street sewer. Not all storm water on the ballpark site is collected in the sewers. Storm water south of Berry Street on the Pier 46B portion of the project site~~ the Embarcadero/King box sewer, and the southern 1/3 portion of Area D drains directly to the mouth of the Channel through two storm drains just east of the Pier 46B building.

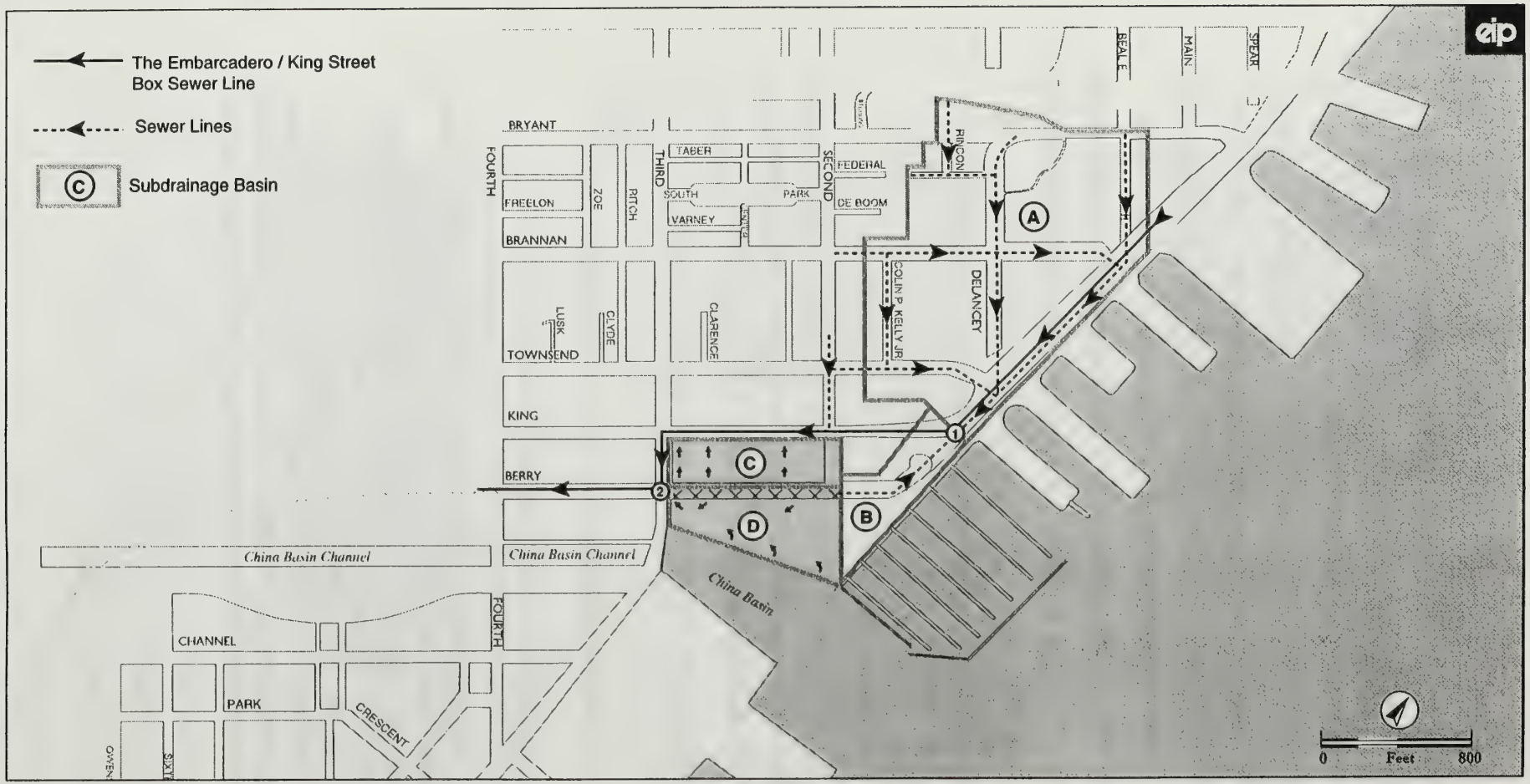
The comment also requests further clarification of the sewer re-routing proposed for the ballpark. Sewer re-routing for the ballpark would consist of three actions. The first involves connecting the Berry Street sewer directly into The Embarcadero/King Street box sewer at King Street. By connecting the sewers at this point, instead of draining into the 2'-6" x 3'-

9" Berry Street sewer, drainage from the South Beach area (Area A) would be discharged into a 17.5-foot-wide by, 30-foot-deep storage sewer that has more capacity and is therefore, less restrictive than the Berry Street sewer. The second action would involve placing a 2-ft. diameter liner pipe in a portion of the Berry Street sewer between Second Street and King Street and connecting it to The Embarcadero/King Street box sewer at point 1. The liner pipe would be embedded in cement grout within the existing sewer and sloped to drain from Second Street to King Street. Thus, the flow direction in this portion of the Berry Street sewer would be reversed from westward to eastward. This portion of the Berry Street sewer would continue collecting flow from Area B. The third action involves capping the Berry Street sewer between Second and Third Streets, filling it with grout and abandoning it in place. As noted above, the City will investigate whether modifications are possible to its existing system.

To clarify the above discussion of proposed sewer changes, the following revisions are made; the revisions do not change the conclusions of the EIR. A new figure has been added to the EIR as Figure IV.J.1 showing the drainage pattern after sewer re-routing. This figure is reproduced on the following page and has been added to the EIR on p. IV.323a.

The first and second sentences of the first paragraph on p. IV.323 of the EIR have been revised as follows:

> **The sewers ~~on~~ east of the ballpark site would be re-routed to ~~accommodate new storm water and sanitary flows from the ballpark~~ allow abandonment of a portion of the Berry Street sewer that passes directly beneath the ballpark site. As discussed below, the sewer re-routing and the new volume of storm water contributed by the proposed ballpark would not substantially decrease sewer capacity in the local area and would not increase the frequency of existing sewer back-ups in the South Beach area or change the frequency of overflows at Third Street into China Basin Channel, which currently is less than three times a year.**



SOURCE: Olivia Chen Consultants, 1997

GIANTS BALLPARK

Figure IV.J.1 (New) Wastewater Flow Pattern After Sewer Re-Route

The following has been added at the end of the third paragraph on p. I.45:

> **This re-routing would not substantially decrease sewer capacity in the local area and would not change the frequency of existing sewer back-ups in the South Beach Area.**

The second paragraph on p. IV.323 has been revised as follows:

> **As previously discussed in III.J. Water Quality and Aquatic Ecology, p. III.174, sewer flows from Area A are to be re-routed in the 2-foot-6-inch by 3-foot-9-inch Berry Street sewer upstream of The Embarcadero and King Street intersection, ~~as part of its planned South Beach Park project~~ by connecting into the higher-capacity 17.5-ft. by 30-ft. Embarcadero/King Street box sewer at point 1 as shown on Figure IV.J.1. Flow from Area B will continue to be captured in the Berry Street sewer, b~~B~~ut the direction of flow ~~east of Second Street~~ in the Berry Street sewer between Second Street and King Street will be changed from a westward direction to an eastward direction and will connect into The Embarcadero/King Street Box sewer at point 1. ~~Flows from the western eastern one-third of the ballpark site would be re-routed in this direction toward a connection at The Embarcadero and King Street intersection, where it would discharge into the King Street box sewer.~~ Flows on the northern part of the ballpark site (Area C) would continue to be collected by sewers in King Street. After the flows upstream of the ballpark site are ~~rerouted~~ redirected into The Embarcadero/King Street box sewer, the portion of the Berry Street sewer within the ballpark site (from Third Street to Second Street) would be capped on ~~either~~ both ends, filled with grout, and abandoned in place, and would no longer accept flow.**

The third sentence in the above paragraph was incorrectly worded in the EIR. Instead of "Flows from the western one-third part...", the sentence should have read "Flows from the eastern one-third part...". However, this sentence has been removed from the EIR because it has been determined since publication of the EIR during refinement of utilities engineering, that all flow from this area will be directed west. Thus, the third sentence has been removed.

The third paragraph on pp. IV.323 - IV.324 of the EIR has been revised as follows:

> **Flows from the remainder of the ballpark site (Area D) would be routed by new internal infrastructure to a collection point near the Berry Street and Third Street intersection, where it would discharge into the ~~Third~~ Berry Street sewer**

and would be conveyed south toward the Southeast Water Pollution Control Plant for treatment. The frequency of overflows at the Third Street overflow outfall would not increase. A substantial drainage area would be diverted away from draining into the Berry Street sewer, reducing flows ~~at the Berry Street and Third Street connection~~ into the ~~Third~~ Berry Street sewer. Flows from ~~the ballpark site and off-site area south of The Embarcadero and King Street intersection~~ Area B also would no longer ~~be collected~~ flow westward in the Berry Street sewer because flows would be re-directed along a portion of the Berry Street sewer into The Embarcadero/King Street sewer, which is a large-volume transport/storage facility ~~used primarily during wet weather~~. Storm water ~~could be~~ is detained in this box sewer ~~before entering the Third Street sewer at King Street where~~ before it ~~would continue~~ is pumped south to the Southeast Water Pollution Control Plant. During high-volume rainfall events when the storage capacity of The Embarcadero/King Street box sewer is exceeded, overflows could occur at ~~the Third Street~~ overflow structures into the Channel and at Pier 34 into the Bay, but this would be no different than what presently occurs.

The comment requests that the existing sewer back-up situation in the South Beach area be further addressed. The City consulted with the facilities managers of the Bayside Village Apartments, Steamboat Point Apartments, the South Beach Marina Apartments, and the Delancey Street Foundation buildings.[49] Except as discussed below, the complexes do not appear to be experiencing significant sewer back-up problems.

The facilities manager of Bayside Village Apartments reports no sewer back-up problems. The Steamboat Point Apartments also does not report sewer back-up problems, except at the South Beach Cafe where water comes out of a toilet during heavy rainstorms. The City and the Port of San Francisco are resolving the problem with the restaurant manager. The South Beach Marina Apartments reports no significant sewer problems, except in its spa/recreation room where the floor drains in the sauna, steam room, and shower stalls overflow during

49. Henry Anderson, Senior Civil Engineer, Bureau of Engineering (Sewers), San Francisco Department of Public Works, telephone conversation with Jim Greene, Property Manager, Bayside Village Apartments, May 21, 1997; telephone conversation with Leo Battle, Steamboat Point Apartments, May 21, 1997; telephone conversation with Martin Fay, Facilities Manager, South Beach Marina Apartments, May 22, 1997; and telephone conversation with Wayne Garrey, Facilities Manager, Delancey Street Foundation, May 23, 1997.

storms. The problem may be related to the fact that the room was constructed about 1 ft. lower than the rest of the first floor; however, the City is undertaking further investigations.

The Oriental Warehouse was constructed lower than street level. Thus, wastewater from the building is mechanically pumped, and does not drain by natural gravity.

The Delancey Street Foundation buildings appear to be the only facility among those identified in the comments that have had a consistent significant sewer back-up problem during the winter rainy seasons. The City and County of San Francisco, Department of Public Works, states that it believes that sewer back-ups have occurred in those buildings because of a combination of 1) South Beach being in a low-lying area of the City, where the ground elevation is very close to the maximum elevation of The Embarcadero/King Street box sewer, and 2) inadequate internal plumbing.[50]

The Embarcadero/King Street box sewer was designed to have a soffit elevation of 3.5 ft. below ground surface in that part of the City. The soffit elevation is the elevation of the top of the inside sewer (i.e., the interior "ceiling" if one were to stand inside the sewer). The Delancey Street Foundation buildings were constructed at an elevation very close to the box sewer's soffit elevation. Therefore, during extremely heavy storms, when the box sewer is completely filled to capacity, overflows occur at outfalls along the Bay shoreline, and flooding problems are more prone to occur. The other reason back-ups have occurred at Delancey is because the plumbing system is inadequate.

In recognition that the back-up problems are continuing problems for the Delancey Street Foundation buildings, City staff have agreed to meet further with Delancey Street and other property owners experiencing sewer backup problems to further address this issue. In

50. Henry Anderson, Senior Civil Engineer, Bureau of Engineering (Sewers), Department of Public Works, telephone conversations with EIP Associates, May 2, 27, 1997, and June 4, 1997.

particular, the City has agreed to conduct additional investigations to determine whether modifications are possible to its existing system that could assist in ameliorating the problem.

Sewer problems experienced along The Embarcadero may be related to internal plumbing inconsistencies and therefore independent of the storage capacity of the City's combined sewer system. A new paragraph has been added to the top of p. III.174 of the EIR:

> **The majority of Area A wastewater is produced by the multi-family residential developments in this area, which include the Bayside Village Apartments, Delancey Street Foundation, South Beach Marina Apartments, and the Steamboat Point Apartments. During periods of heavy storms, sewer back-ups have regularly occurred at the Delancey Street Foundation buildings. The City has agreed and is actively working with Delancy Street and other property owners with sewer backup problems to identify further solutions.**

As noted on p. III.167 of the EIR, the volume of rainwater during wet weather can be as much as ten times the volume of sanitary sewage. This means that up to 90 percent of combined flow can be storm water. As described in the EIR, the City's combined sewer system collects and treats both sanitary wastewater generated during dry weather, and combined sanitary wastewater and storm water during wet weather. The Clean Water Program began a major sewer system upgrade in the 1970s to improve water pollution control. The upgrade is complete in the area north of the Channel and included constructing high-capacity storage/transport box sewers that have the capacity to store millions of gallons of combined sanitary and storm water. The Embarcadero/King Street box sewer, described on p. III.174 of the EIR and discussed in further detail below, is one of those box sewers that was constructed as part of the upgrade. The Embarcadero/King Street box sewer is designed to handle combined flows of sanitary and storm water during wet weather. Therefore, during dry-weather ballgames for example, if all toilets at the ballpark are flushed during the 7th inning stretch, The Embarcadero/King Street box sewer would have more than adequate capacity to handle the wastewater generated by the ballpark, and would be able to handle events that might occur during wet weather such as the 5 large and 30 to 40 smaller music events (described on pp. II.21 - II.22 of the EIR). It should be noted, however, that

the five large events would not likely occur during a major rainstorm, or at least attendance would not be at capacity. Likewise, wastewater generated by other uses that could be developed in proximity to the ballpark (e.g., restaurants) could be accommodated by the existing sewer system.

Even with the upgrades made to the sewer system, there is a maximum amount of combined flow that the system can handle, beyond which overflows occur. The volume of combined flow within the system at any one time is determined by a storm's intensity and duration, factors which are not controllable. Therefore, during other non-baseball events proposed for the ballpark, the sewer system would be sufficient to handle combined dry- and wet-weather flow, but depending on how much rain falls during a storm, The Embarcadero/King Street box sewer could still potentially overflow, as currently permitted under the City's NPDES permit for the Southeast Water Pollution Control Plant. Therefore, the capacity of the City's sewer system has limitations, but is generally adequate.

The regular major league baseball season occurs during the dry season, when there is rarely any rainfall or runoff. During rain storms, ballgames are often canceled, and thus, little sanitary wastewater would be generated. In cases of "rained out" or canceled games, fans would leave the ballpark with minimal generation of sanitary wastewater. The ballpark would add very little sanitary wastewater to the combined sewer system during wet weather. The increased amount of storm water runoff generated by the site due to extension of sewer services to previously unserviced areas is discussed on pp. IV.324 - IV.325, and the conclusion is that the ballpark's additional volume of storm water would be offset by the detainment action of the playing field. Therefore, the ballpark would not add amounts of wastewater or storm water that would exceed the capacity of the City's combined sewer system.

Comment

Any fertilizers or other chemicals used on the playing field (IV.325-326) should be the least toxic possible to the marine environment, in case of a spill or overflow. The project sponsor

should consult with Southeast Water Pollution Control Plant operators to ensure that chemicals used are compatible with chemicals used in sewage treatment operations. (Corinne W. Woods)

Response

Fertilizers and pesticides used on the new playing field would be similar to those currently used on the playing field at 3Com Park; the differences in chemical quality of drainage water would be minimal. The City's Bureau of Environmental Regulation and Management was consulted during preparation of the EIR about the chemical quality of the drainage that would discharge into the collection system from the playing field at the proposed ballpark. The City indicated that chemicals used on the playing field would not pose a threat to the ability of the treatment plant to adequately treat the drainage.[51] The fertilizers used are typical turf growth promoters. Relative to fertilizers, pesticides generally pose more of a treatment problem, but pesticides on the playing field would be used only on an as-needed basis and must conform to the City's Pesticide Use Ordinance. Further, no spills or overflows of playing field chemicals are anticipated, as the playing field would be confined in the interior of the ballpark structure.

Comment

The DEIR proposes that after completion of the parking lot, drainage improvements would convey rainwater to City sewers for "treatment at the Southeast Water Pollution Control Plant" (Southeast Plant, p. V.70.). The DEIR refers only generally to these "drainage improvements," without identifying and analyzing their specific characteristics and impacts...

While it is encouraging, that the DEIR recognizes the need for mitigation of the impacts of storm water run off at the parking lot, the DEIR still fails to adequately analyze the proposed drainage improvements and to identify their impacts on the San Francisco Bay.

The DEIR fails to adequately describe the environmental impact of the drainage of parking lot run off into the City's overtaxed sewage system. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

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51. Steven Medbery, Chief, Bureau of Environmental Regulation and Management, Public Utilities Commission, City and County of San Francisco, telephone conversation with EIP Associates, December 11, 1996.

Response

Contamination issues for the parking lots south of the Channel are discussed in Contamination and Environmental Risk, South-of-Channel Parking Areas. The effects on water quality of parking lot runoff are addressed in Water Quality and Aquatic Ecology, and Parking Lot Runoff.

Previous environmental analysis performed in the *Mission Bay EIR* indicate that treatment capacity at the Southeast Water Pollution Control Plant is adequate for development of Mission Bay; that the increased sewage generation from buildout of Mission bay would have no substantial effect on the treatment capacity of the Southeast Water Pollution Control Plant nor on the collection capacity of the Division Street pump station and the Mariposa pump station; and that the increase would not measurably affect the City's ability to limit wet-weather overflows to the required limit.[52] Therefore, the parking areas south of the Channel would not adversely affect the treatment capacity of the Southeast Water Pollution Control Plant.

Also analyzed in the *Mission Bay EIR* was the adequacy of the infrastructure in the area. The *Mission Bay EIR* found that in order to serve development in Mission Bay, some of the existing sewer lines would require replacement, except for the large box culverts at King, Berry, Channel, and Third Streets. Therefore, because no specific drainage design is available for the parking areas, a mitigation measure was developed that required appropriate drainage design and collection of flows to the City sewers (see p. V.70 of the EIR). Collection of flows from the parking areas would require laying collector pipes that feed into the larger existing sewers in that area along Channel, Third, and Fourth Streets (see p. III.174 of the EIR).

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52. City and County of San Francisco, Department of City Planning, *Mission Bay Environmental Impact Report*, Volume Two, Technical Analyses, SCH No. 86070113, August 1990, p. VI.D.105.

Parking Lot Runoff

Comment

In addition to controlling demolition and construction debris and stormwater runoff and sediment to prevent it from draining into the Channel or the Bay during the construction period (IV.306-320, V.66-70) by use of a Storm Water Pollution Prevention Plan, the Project Sponsor should be responsible for any dredging of the Channel or other mitigation (such as improvement of the combined sewer system) that may become necessary because of sedimentation or contamination during construction; or contamination from runoff or increased overflows of the sewer overflow structures resulting from operation of the ballpark, either on site or in or around dedicated parking areas. (Corinne W. Woods)

Response

Except for the purposes of maintaining navigability of China Basin Channel, dredging would not be a desirable mitigation for the ballpark's sedimentation effects as it has many water quality impacts of its own. In fact, dredging would have similar, if not greatly higher, effects on aquatic ecology as the sedimentation and resuspension effects described in the EIR, which include disturbance or destruction to benthic organisms and fish and release of contaminants bound to sediment particles. Thus, any sedimentation or contaminants associated with construction or operation of the ballpark would best be controlled at their source. Therefore, no further mitigation measures beyond those described in the EIR on pp. V.66 - V.71 are recommended. See the previous response under Water Quality and Aquatic Ecology, Impacts on Capacity of Wastewater Treatment and Sewers.

Comments

In addition to direct traffic and parking impacts, the effects of the...parking area storm water runoff...should be specifically addressed for the waterfront area, and appropriate mitigation measures that do not inordinately burden existing users must be included and funded in the project plan. (Comment from petition attached to letter by John H. Super, Commodore, Bay View Boat Club, and to letter by Betty A. Boatright)

Any dedicated parking site should be studied and improved (at project owner or parking lot operator expense) for...adequate sewage and stormwater runoff containment... (Corinne W. Woods, Secretary, Bay View Boat Club)

There is no study of the impacts of the parking lots on the aquatic habitat, including runoff. This is a significant omission. (Bob Isaacson, President, Mission Creek Conservancy)

I feel the same about surface run-off which will carry the new highly toxic gasoline additives (MTBE) into drainage systems and the impact of which should be analyzed and included in the EIR. (Silva B. Creg)

C. The DEIR fails to adequately analyze the multitude of environmental impacts of storm water run off at the South of Channel Parking Area.

The South of the Channel parking area is not connected to the City's sewer system (p.IV.308). Thus, during construction and operation of the parking area, storm water will wash untreated hazardous metals, petroleum and other contaminants through ground water or across paved surfaces directly into the Bay (p.III.166). In addition, increased storm water run off draining directly into China Basin Channel will create turbidity [in the water], suspending contaminated sediment and having well documented deleterious effects on the aquatic life in the Bay. The DEIR fails to analyze the environmental impacts of increased storm water run off created by the South of Channel parking area.

...[T]he oil/water separators proposed for storm water inlets may filter some petroleum contamination, but will not reduce the heavy metals, metals from car brake pads, glycol or antifreeze discharged or released from increased automobile usage and soil contaminants at the site being washed into the Bay from the 5,000 car parking lot. In spite of capping and paving the area, contaminated run off will flow directly into the Bay along the surface of the pavement, beneath it and through cracks which inevitably develop. The impacts of these occurrences are not analyzed in the DEIR. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

Sedimentation from storm water runoff from the parking lot area is discussed on pp. IV.308 - IV.309 of the EIR, and without mitigation, its effects on aquatic ecology could include reduction of algal photosynthesis, bioaccumulation of contaminants, and degrading herring spawning habitat. The area would probably contribute storm water to the Channel, but high sheet flow over the area is not expected due to its flatness. As stated on p. III.174, the parking area south of the Channel is partially sewered, but the edge of the triangular-shaped parking area (Figure II.D.5 on p. II.20 of the EIR) has the highest potential to contribute sediment to the Channel during grading and paving due to its proximity to the water's edge. However, as discussed on pp. IV.308 - IV.309, grading and paving activities in that area would be completed in a relatively short time period and would reduce the length of time that

soil is exposed. Detailed mitigation measures were not recommended because the project would be required by state law to prepare and implement a SWPPP that would include measures to minimize erosion and sedimentation to the Channel. No further construction impact is expected with implementation of a SWPPP, and no further mitigations are needed. See the previous responses for Construction Runoff and Storm Water Permitting.

The EIR addresses post-construction measures to improve the quality of storm water runoff from the parking areas. These measures require that drainage improvements be designed such that all runoff would be collected in the City's sewers for treatment at the Southeast Water Pollution Control Plant (p. V.70). Contaminants in runoff, including MTBE, heavy metals, metals from car brake pads, glycol, antifreeze, and other typical urban runoff contaminants would be removed during treatment before waters are discharged from the treatment plant into the Bay. This information has been added to p. IV.325 as a new paragraph after the second paragraph:

> **Drainage from the parking areas south of the Channel would contain typical urban pollutants such as oil and grease, heavy metals, metals from car brake pads, glycol, and antifreeze. If storm water from the parking areas containing these pollutants drain directly into the Bay directly with little or no treatment, the amount and type of pollutants would be similar to that generated by similar urban areas in the San Francisco Bay region. Drainage improvements would be provided for the parking areas, but no specific drainage design is available. A mitigation measure on p. V.70 requires that drainage improvements for the parking areas be designed such that all drainage from the parking areas be collected for treatment before discharge into the Bay.**

Litter in the Channel and Bay

Comments

Litter from ball game patrons will blow into the Creek and Bay. (Maria Woodard, Orville Pitney, John H. Super)

[I]n the Summary, I.55 and Mitigation Measures V.69-70, "placement of trash receptacles, regular collection of trash, public education and noticing, and regular skimming of the surface of the Channel..." are measures NOT included in the Project. This appears to be a

serious problem. Since there is no question that litter blown or dropped into the Channel or the Bay would create "potential choking and feeding hazards to aquatic organisms foraging at the mouth of the Channel and in the Bay," mitigation of this serious environmental hazard MUST be included as part of the Project Plan, and should be funded by the Project Sponsor in order to protect and preserve the aquatic habitat.

The situation is bad enough now, with homeless encampments along the Channel and the Bay, and the paper recycling operation on the West side of Terry Francois Blvd. north of Mission Rock Street. Adding the element of six-pack rings and other tailgate party debris from more affluent (and likely more disposable packaging oriented) users would make it much worse.

In addition to adequate fencing and frequent and effective litter pickup on site and in the water, dedicated ballpark parking, which would encourage tailgate parties, should be sited further away from the Channel and the Bay, so that containment is at least feasible, given the typical wind direction and speed during spring and summer months. (Corinne W. Woods)

In addition to direct traffic and parking impacts, the effects of...litter (on shore and in the Bay) should be specifically addressed for the waterfront area, and appropriate mitigation measures that do not inordinately burden existing users must be included and funded in the project plan. (Comment from petition attached to letter by John H. Super, Commodore, Bay View Boat Club, and to letter by Betty A. Boatright)

Impacts which have not been thoroughly enough studied, documented and for which adequate mitigation has not been developed include:

...confining effects of intense human activity, including ...debris and blowing trash ...to the stadium site, and preventing these activities from adversely affecting the waterfront and bay fisheries. (Dave Mochel, Penguin Boat Co.)

The DEIR fails to adequately analyze the environmental impact of litter on the bay and its aquatic and bird life.

The introduction of litter generated from the Ballpark poses significant choking and feeding hazards to aquatic wildlife as well as violation to the Basin Plan Water Quality Objectives (p. V.69, IV.328). The DEIR fails to adequately analyze the impact of Ballpark litter on aquatic wildlife. No projected quantities are cited, the quality of the litter is not described and the species which would be significantly affected are not analyzed.

The mitigation measures proposed, trash receptacles and maintenance staff to skim the surface of the water (p. IV.327), will help to mitigate the litter hazard, but the DEIR fails to analyze the effectiveness and reliability of these measures and how they would be maintained, monitored and paid for, as they do not appear to be included as part of the project. Where completely eliminating litter entering the Bay is not logistically feasible,

other mitigating measures such as elimination of litter in other parts of the environment should be considered. The deleterious impacts of unretrievable litter, may still be mitigated by attending to litter at another location. (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Any dedicated parking site should be studied and improved (at project owner or parking lot operator expense) for litter control... (Corinne W. Woods, Secretary, Bay View Boat Club)

Response

The potential effect of litter on the Channel and Bay is discussed on pp. IV.327 - IV.328 of the EIR. Litter in water would pose choking hazards to wildlife and would be inconsistent with the Basin Plan for the Bay. Litter within the ballpark structure would be in a confined area and would have little potential to be blown out of the ballpark structure into the water. The areas identified to have the highest potential to contribute litter to waters are areas adjacent to the Channel and Bay such as the Port Walk, the Lefty O'Doul and Peter Maloney Bridges, and the South-of-Channel parking areas. It is recognized that potential tailgate parties in the parking areas could also generate trash. If chain-link fencing is proposed for the parking areas, trash could be prevented from being blown into Bay and Channel waters.

The mass, volume, and type of litter that might be generated by ballpark events would be similar to what is generated at 3Com Park. It is not possible to reliably estimate what proportion of that amount would be subject to transportation to the Bay. The type of litter expected to pose substantial hazard to aquatic biota and shoreline birds is litter composed of non-decomposable materials and can include, as suggested, plastic six-pack rings, styrofoam containers, and other paper and plastic debris.

Litter from the parking areas that is not entrapped by the surrounding fencing would be removed or prevented from entering Bay and Channel waters with implementation of the mitigation measures recommended on pp. V.69 - V.70 of the EIR. The measures include convenient placement of trash receptacles, regular collection of trash, posting signs and warnings, and regular skimming of the water's surface. These measures are not now included as part of the project. However, the approving agencies, including the Planning

Commission, Zoning Administrator, SFRA, Port Commission, and Board of Supervisors, may impose these measures as conditions of approval on the project during the project approval process. Comments received on the Draft EIR will be considered by the approving agencies.

Litter in South Beach Harbor

Comments

The proposed ballpark will be constructed adjacent to South Beach Marina, an existing, water-oriented recreational facility authorized in BCDC Permit No. 2-84. A number of the occupants of that marina have contacted the Commission staff raising concerns about potential ballpark impacts on the marina. These concerns have included: ... and (6) an increase in litter and debris in the marina and adjoining public areas both during construction and when the ballpark is completed, from ballpark patrons. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

The environmental impacts on South Beach Harbor warrant specific attention. Impacts on this most immediate neighbor of the new ballpark have been seriously overlooked. The marina was treated as though it weren't even there. This reflects an inadequate understanding by DEIR authors of the marina's function and role as a recreation and open space resource... The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... litter impacts on harbor use [are not] adequately addressed. (Martin Fay, Rincon Point - South Beach CAC)

(Also missing from the EIR) During spring and summer (the baseball season), the prevailing wind blows from west to east, i.e., directly from the ballpark to the harbor. The park will likely become a spot for "tailgate" type picnics and celebrations. Wrappers, papers, cups, etc. will land on boats or on the water in the harbor. The latter has the potential to foul propellers, clog intake valves, and cause a general nuisance. No provision is made for mandatory cleanup costs.

...Cleanup crews must include the harbor in their jurisdiction. Fines could be levied if the crews do not include the harbor in post-game patrol. (Doug Gooding, CAC member)

After the stadium is operating, who will pay for the cleanup of airborne debris trapped in the harbor waters, the boats berthed in the harbor and the San Francisco Bay waters. (Mark Miner)

IV.328 Will the Giants be taking measures to discourage tailgating in parking lots? Existence of marina adjacent to ballpark is ignored. Litter could affect boat operations as well. (Sue C. Hestor, Advocates for South Beach Harbor)

Though it has been brought up at several CAC meetings and at public meetings, the DEIR has ignored the existence of the South Beach Harbor...litter...problems must be studied as to the effect on this existing Maritime use of the immediate area. (Janet Carpinelli)

[Impact on the South Beach marina, including] litter in the bay...[must be considered and minimized]. (Abigail A. Grafton, M.A., M.F.C.C.)

Response

As indicated in the comment, litter generated by ballpark patrons could be transported to South Beach Harbor. As discussed on p. III.56 of the EIR, the prevailing wind directions in San Francisco are northwest, west-northwest, west, and west-southwest. From China Basin Channel, litter could drift and could be blown into marina waters. The project sponsor does not propose to discourage tailgate parties that would potentially occur at parking areas. See Litter in the Channel and Bay for a discussion of litter effects on water quality.

Maintenance at South Beach Harbor is provided by the Harbor, and includes repairing holes, replacing signs, landscaping, and trash collection on the water surface and on the land portion of the Harbor. Trash collection is performed as needed every day of the week. The Harbor would continue to be responsible for litter collection at the Harbor. If the Harbor determines that additional staff would be needed in order to continue adequate maintenance, the Harbor, the Giants, the City, or and the SFRA would be responsible for providing staff and any necessary funding.

GROWTH INDUCEMENT

Impact of Nuisance Land Uses

Comments

Considering Prop M mandates, the obvious areas of degradation of our neighborhood include traffic and parking, but we also do not want to be over run with franchises, sports bars, and to have the area become an entertainment zone which is in complete conflict [with] the neighborhood that has been in the planning since 1981. (Louise Bird)

Other issues of concern [to the South Beach area] includ[e]... potential nuisance land uses... are nowhere analyzed...[T]here is no quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel).

Page IV.24, Related commercial uses: There must be an adequate analysis of the impacts of new related commercial uses, such as sports bars, souvenir shops, and fast food restaurants, on existing and proposed land uses, particularly residential uses. The Draft EIR contains no such analysis. (Steven L. Vettel, Residential Properties Group)

Nuisance land uses: The City and Redevelopment Agency should establish a special use district overlay around the ballpark to control potential nuisance land uses, including bars, nightclubs, fast food restaurants and souvenir shops. An entertainment use district could be established near the ballpark but away from sensitive residential uses. (Steven L. Vettel, Residential Properties Group)

Each one of the Eight Priority Policies has direct relevance to the Ballpark project, and must be addressed by the Giants, the city, or both. Actions or project components which we feel would contribute to a "Priority Policy Conforming Project" that is responsive to each of the Eight Priority Policies include: "That existing neighborhood serving retail uses be preserved and enhanced..." "That a diverse economic base be maintained by protecting our industrial and service sectors..." The DEIR must include consideration and analysis of General Plan and zoning provisions that require review of all ground floor commercial use permits within the area of influence of the ballpark, to assure that neighborhood serving retail uses are not being displaced, and/or enactment of a special use district designed to protect and encourage neighborhood serving retail uses. The special use district could also be used to protect industrial and service sector uses in the area. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...bars and cheap food outlets that will accompany the new ballpark. (Janet Carpinelli)

[P]otential land use conflicts between ballpark related commercial uses that will be attracted to the area (growth induced uses), and neighborhood serving and residential uses are too narrowly defined. Any change in commercial use profile should be guided by a plan and not left to market forces that could well drive out neighborhood serving retail. Such a plan is not defined nor analyzed by the DEIR. Such a plan should be defined and included as part of this project. (Martin Fay, Rincon Point – South Beach CAC)

Specific "Area Plan Assumptions" the DEIR must analyze, include... A plan to insure that a balance is maintained between neighborhood serving commercial and other commercial uses that might compete for commercial space as a result of the ballpark. (Martin Fay, Rincon Point – South Beach CAC)

[The specific area plan assumptions that the DEIR must analyze must include]...a plan to ensure that a balance is maintained between neighborhood-serving commercial and other commercial uses that might be for commercial space as a result of the ballpark... (Martin Fay, Rincon Point-South Beach Citizens Advisory Committee)

The DEIR should consider the impacts of establishing an entertainment use district away from the South Beach residential area where these types of uses would be permitted. Mission Bay North is a suggested area. (Martin Fay, Rincon Point – South Beach CAC)

Neighborhood effect of additional tourist/event related entertainment venues such as taverns, sports bars, merchandise sales shops, etc. (Michael Karasik, Bayside Village Associates)

Place a strict and enforceable limitation on the following types of new businesses in the South Beach Area, east of Third Street and south of Harrison Street: sports bars, establishments that serve liquor other than as an adjunct to a full service restaurant, souvenir shops, etc. Establish an entertainment use district away from the South Beach residential area where the permitted uses can open. (Michael Karasik, Bayside Village Associates)

The DEIR should consider the impacts of placing limitations on the following types of new businesses in the South Beach Area, east of Third Street and south of Harrison Street: sports bars, establishments that serve liquor other than as an adjunct to a full service restaurant, souvenir shops, etc. (Martin Fay, Rincon Point – South Beach CAC)

[T]he DEIR did not address...protecting the quality of the neighborhood from certain ballpark related uses, such as sports bars and T-shirt shops and such, keeping them more away from the residential area. (Richard Dickerson, South Beach Marina Apartments)

The EIR states on page IV.332 that the project would foster the development of new business in the project vicinity, and that the project "could intensify the pace and change the type of future growth". The Court has found that projects which stimulate demand for development create growth-inducing impacts (*Stanislaus Audubon Society v. Stanislaus County*, 33 Cal.App.4th 144). As the EIR admits that the project would stimulate demand for growth,

this must be labeled as a significant impact and mitigations must be developed as a question of law. To decide otherwise, in the language of the above case, would be an attempt to "unring the bell". (Scott MacPherson)

The agency has also disregarded things that are mentioned marginally in the growth [inducing] impact section, Pages 331 to 334, which is the proliferation, which they acknowledge is going to happen, of sports bars and restaurants and nighttime activities around this. That is another impact. (Sue Hestor)

[S]ome of the concerns were mentioned before about the sport clubs that are going to be invading around the Giants stadium and the Forty Niners stadium, you can imagine what we go through in the Mission District, 24th and Mission. It is hell. (Tony Santiago, Mission Advisory Table)

Response

The commentors ask that the EIR discuss the potential of the project to induce growth, discuss the nature of the growth to be expected, and most importantly, assess the neighborhood impacts of that growth. Growth-inducing impacts of the ballpark are analyzed in the EIR on pp. IV.330 - IV.334.

Under CEQA, growth-inducing impacts primarily are expected as the result of the development of infrastructure or the development of residential, office or other uses in an undeveloped area. The ballpark project does not include the development of infrastructure beyond that necessitated by the ballpark and does not include the development of housing or office uses. The other area of potential adverse impact to be discussed under growth inducement is the impact of development that is directly or indirectly induced by the ballpark project.

The EIR includes information regarding potential growth in surrounding areas on pp. IV.331 - IV.334. The discussion includes "reasonably foreseeable" development that would occur as a result of the ballpark. This is primarily an "additional demand for restaurants, bars and retail establishments," as described on p. IV.331 of the EIR. Again on p. IV.332, "the ballpark could intensify the pace and change the type of future growth." The ballpark would encourage a trend towards restaurants, bars and retail establishments. Under CEQA, this

trend is not itself an adverse physical impact; however, adverse physical impacts could result from the induced development.

The commentors note that "nuisance land uses" would increase in the project area as a result of the ballpark. The EIR did not find that there would be any potentially significant effects arising from the compatibility of the ballpark with existing residential use, or from the increase in pedestrian use in the area, or from the growth-inducing impacts of potential sports bars or restaurants. The extent or character of induced growth is speculative and unquantifiable. As discussed in the EIR, p. IV.331, the ballpark would be part of the redevelopment of the project area that has been ongoing for the last ten years. Thus, mitigation measures or land use controls such as those recommended by the commentors are not proposed at this time.

The EIR discusses impacts on land uses in the project vicinity, including residential and neighborhood-serving retail, under the headings "Compatibility with Surrounding Uses" and "Increased Pedestrian Activity" on pp. IV.23 - IV.23; litter at the ballpark and in the parking lots is cross-referenced on pp. IV.327 - IV.328 and in Land Use, Project Impacts on Commercial Uses.

The Land Use section includes cross-references to further impacts discussion under individual topics including Noise, pp. IV.245 - IV.251 and Transportation, p. IV.144. Growth inducement impacts are analyzed in the EIR on pp. IV.330 - IV.334. Additional discussion of neighborhood and quality of life impacts of the project is presented in Land Use, Neighborhood Effects/Quality of Life. Land use and growth-inducement impacts, in general, are hard to quantify and the discussion of impacts is, thus, descriptive and qualitative. As noted in the Growth Inducement section of the EIR, to the extent the project would induce growth of commercial activity in the vicinity, associated impacts including transportation, noise and litter would increase.

Some of the impacts discussed under Neighborhood Effects/Quality of Life are socioeconomic impacts outside the scope of the EIR. The City decision-makers would consider such impacts when they consider the project, approval of the project and conditions of approval, if any. The City may wish to establish a committee/study area/review process to monitor changes to the area and assess impacts on residential uses and local businesses. In addition, the project sponsor could establish a neighborhood liaison, who could convene a committee of neighborhood representatives and appropriate City agencies, see Land Use, Neighborhood Effects/Quality of Life and new text added to EIR p. IV.23.

Creating an additional special use district around the ballpark is not under consideration at this time. The City may elect to consider zoning restrictions at a future date. The City may also decide to adopt restrictions on uses in the future if the suggested special use district is appropriate. Catellus is pursuing entertainment/commercial uses in a portion of the Mission Bay North area and the Port of San Francisco proposes development on the piers and seawall lots (land-side parcels) both north and south of the ballpark site; the City may wish to consider a special use district for entertainment uses or for protection of nearby residential uses. Such a special use district is not considered a part of this project.

Chapter II, Project Description, pp. II.27 - II.28 of the EIR discusses the eight Priority Policies in Code Section 101.1, and notes that the Planning Commission or Planning Department would make a determination of the project's conformance with the Priority Policies.

Existing businesses may well survive any ballpark traffic problems since the businesses are located on The Embarcadero which is already a major thoroughfare. Traffic issues would be similar to the Saturday market further up the street, though on less days and of higher peak.

In addition, if businesses do choose to relocate, there is a lot of room for growth in the project area -- China Basin Landing has many vacancies on the ground-floor and on upper floors. The residential complexes also have ground-floor vacancies along The Embarcadero.

M-2 Zoning in Project Vicinity

Comments

The block immediately to the north of the ballpark (between 3rd, Townsend, 2nd & King) and one of the blocks immediately to the west of the ballpark (4th, Berry, 3rd, China Basin Channel) are zoned M-2. When the Downtown Plan and South of Market Plan were adopted, the Planning Commission recognized that there were problems with the few remaining blocks with M-2 zoning, zoning which allows a broader range of development than was otherwise permitted in surrounding areas. These are the blocks which were not caught up in the South Beach Redevelopment Area, South of Market rezoning, Downtown Plan and Mission Bay rezoning. They are orphan blocks. The Department was supposed to initiate a study to modify these and other M-1 and M-2 zones, particularly in the area south of Market to Potrero Hill and west towards the Mission, so that development in those areas was somewhat consistent with development restrictions applied to other nearby areas. That rezoning never happened. Now the City is faced with the potential of development and uses on the block directly to the north of the ballpark and uses in the China Basin building to the west of the ballpark being subject to fewer controls than any other block in the downtown and South of Market area. This would include the possibility of fast food, bars, restaurants, adult entertainment, arcades, parking garages and other such uses which could be approved with no Commission hearing. The M-2 zoning of those blocks should be immediately reevaluated. Until such evaluation is complete, the City should impose a development moratorium or, at a minimum, require review by the Planning Commission of each new or expanded use on those blocks. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

[Page] IV.332 - potential growth: As is set out above the existence of 2 blocks of M-2 zoning adjacent to the ballpark is particularly threatening because of the wide variety of uses that are inconsistent with the adjacent residential area. This must be recognized as a problem. In addition, when the South of Market rezoning and South Beach Redevelopment Plan were adopted, no one contemplated a ballpark at this location so zoning controls did not take into account the need to regulate fast food, bars and other activities which could generate late night activity, noise and conflicts. Additional controls over such uses should be considered now before those uses start opening up. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Response

The commentor refers to the M-2 zoning of the block currently occupied by the China Basin and China Basin Landing buildings and the block immediately north of the ballpark. The commentor is correct that adult entertainment and arcades (Planning Code Section 221), parking garages (Planning Code Section 223), and other such uses are allowable on these

blocks as a principal use. Until now rezoning of those areas has not been identified in the Planning Department's work program and budget. This rezoning could be considered along with potential future changes in Mission Bay. Alternatively, the rezoning would have to be prioritized and funded independently.

M-2 use districts are "suitable for larger industries served by rail and water transportation and by large utility lines," and are the least restricted as to use, generally separated from residential and commercial areas. Heavy industry is permitted with fewer requirements for screening and enclosure, however, many of these uses are permitted only as conditional uses or at a considerable distance from Residential Districts (Planning Code Section 210). The height limit for these parcels would be as indicated on Figure III.A.2, Height and Bulk Districts, p. III.14 of the EIR: 60 feet without any bulk limitations for the Fourth/Berry/Third/Channel block and 105 feet with specified bulk limits for the Third/Townsend/Second/King block.

Secondary Effects of Nuisance Land Uses

Comment

The Initial Study (page A.24) stated that "[c]oncerns have been expressed regarding potential secondary effects of the ballpark on police services resulting from growth in surrounding commercial facilities, such as sports bars. This issue will be discussed in the growth inducement section of the EIR." No such discussion is included in the EIR, although page IV.333 - IV.334 states that the project "would encourage new liquor license applications for restaurants, sports lounges and bars." (Scott MacPherson)

Response

The commentor is concerned about the secondary effects of the potential proliferation of sports bars. During the course of EIR preparation, information was obtained on the experiences of Cleveland and Denver with regard to the development of sports bars. As summarized in the EIR on p. IV.332, the Denver and Cleveland ballparks stimulated the development of new business, including office, retail and restaurant uses, and generated an increase in the cost of housing. Over the five-year period following the construction of

Coors Field, permits for restaurants and hotels increased while liquor licenses for sports bars declined or remained level. This information can be found in the background documentation available for public review at the City Planning Department, 1660 Mission Street.

Further, the growth of sports bars or taverns would be regulated by the liquor license application process. All applications for a liquor license involve a public review process. Applications are reviewed and if accepted, then a notice of application is published in the local newspaper with a hearing date. Interested citizens may present testimony at the public hearing.[53] Thus, though the potential growth of sports bars is unquantifiable at this time, the development of sports bars would be subject to further public review.

53. Officer Ramos, Permits-Taxi Detail, San Francisco Police Department, telephone conversation with EIP Associates, June 3, 1997.

MITIGATION

General

Comments

The focus of finalizing the DEIR should be more on solving the problems - identifying and strengthening mitigation measures, rather than additional detailed quantification of impacts. Lets acknowledge problems and impacts, particularly as they impact affected neighborhoods, define standards for environmental quality and livability, and develop mitigations, processes and commitments for solving problems when standards are exceeded. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

I am concerned that there will not be sufficient mitigation regarding...neighborhood quality due to the additional pressures created by the ballpark fans and concert goers. (Elizabeth Carney)

When the additional probable negative effects from noise, litter, air quality from traffic congestion, etc. are added into the equation, it is hard to see how the negatives to a significantly large number of local residents can be ignored or glossed over. (John Gott)

To conclude, all neighborhoods located in proximity to the proposed stadium are going to have to adapt to some potentially negative changes in their environment. Although it is fair to expect some accommodation on the part of these neighborhoods, it would be unfair to expect them to accept being inundated with fans, cars, trash, crime, litter and air, sound and light pollution 120+ days a year. Even the best efforts at mitigation are still going to require that these neighborhoods tolerate new and unpleasant changes, and anything less than the best attempts at mitigation are asking these communities to accept the destruction of their very fabric. And for what is this sacrifice being asked? For a new hospital, a new school or a new library? No. It is being asked (or demanded) for a new entertainment center. (Sarah Ames)

The Draft EIR took an unduly narrow view of CEQA and of the types of information and impacts analysis decision makers in San Francisco need before they are asked to approve the ballpark. For example, even though the ballpark will be located in a densely populated urban environment, there is no discussion whatsoever of its impacts on the neighborhood's quality-of-life except as regards transportation, noise and light...The DEIR recommends mitigation measures for other impacts (such as traffic) that may cause adverse impacts on quality-of-life issues, but the quality-of-life impacts of these mitigation measures are not analyzed. (Steven L. Vettel, Gladstone & Vettel)

South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the traffic...that will accompany the new ballpark. (Janet Carpinelli)

Response

The EIR discloses project impacts that could adversely affect the surrounding neighborhood, including, for example, traffic, parking, noise, and lighting. The EIR identifies mitigation measures for potentially significant environmental impacts under the relevant topics, Chapter V., Mitigation Measures Proposed to Eliminate Potential Adverse Impacts of the Project. Additional mitigation and improvement measures have been suggested by commentors and these are discussed, under the topics of Noise, Air Quality, Transportation, Land Use, Visual Quality and Growth. The specific recommendation of a "Neighborhood Protection Plan" is discussed below in Neighborhood Protection Plan.

A revised concert noise mitigation is provided in responses in Noise, *Impacts*, General Construction Noise. Additional mitigation features for the preliminary traffic routing plan described in Traffic Mitigation Measures in the EIR are presented in responses in Transportation and Circulation, Transportation Mitigation under a number of subsections, including *Transportation Mitigation - General*, *Traffic Routing Plan* (subsections on Closure of Third Street at Lefty O'Doul Bridge, China Basin Channel Bridges, and Miscellaneous Traffic Routing Plan Issues), and *Transit Mitigation Measures* (subsections on Transit Incentive Program, CalTrain, MUNI and Ferry Service). Discussions of improvement measures that could improve traffic and pedestrian circulation are also found in the Transportation Mitigation section of responses, including a list of features that a Ballpark Transportation Coordinating Committee could consider in implementing a Transportation Management Plan under *Ballpark Transportation Coordinating Committee*.

Improvement measures to reduce less-than-significant impacts are described in responses to comments in Visual Quality, Lighting - Field Lighting Testing, and in Air Quality under Construction Mitigation, as well as under the Construction Transportation and Traffic Impacts subsections of Transportation and Circulation. Improvement measures described in the EIR text for parking issues (pp. IV.214 - IV.215) have been expanded for clarification in Transportation and Circulation, Parking responses.

The issue of whether potentially adverse impacts on affected neighborhoods is acceptable would be determined by the public agencies reviewing the various authorization required by the project. As noted in the discussion above under "Sponsor's Objectives," these agencies will have to determine if it is appropriate to approve the project or to place conditions on the approval of the project, considering the potential adverse impacts and the goals of the project.

CEQA Guidelines Section 15126(c) requires that potential significant environmental effects of implementation of mitigation measures be discussed. The potential impacts of the traffic routing plan mitigation were discussed in detail, including secondary impacts of this rerouting on air quality and noise. Other proposed improvement or mitigation measures would minimize impacts without apparent substantial secondary adverse effects, e.g. measures to reduce noise, glare, hazardous materials exposure etc. and therefore no further analysis was required.

Comments

In our response (dated 11/12/97) to the scoping document for this EIR, we asked that the possibility of a curfew on [special] events be studied as a mitigation measure. We ask again that this be considered... If the Board of Supervisors were to approve such a use for the facility, a mitigation measure should be the requirement of a special use permit, with attached mitigations and restrictions, for each scheduled event, and the proviso that such events could only be held on weekends, concluding no later than 10PM. (San Francisco Tomorrow Waterfront Committee)

V.45/46, Special Events: A key mitigation is to have project sponsor pay 100% of the incremental costs for these special events. (Diane Nygaard)

Response

The decision-makers will consider whether to impose various mitigation measures as conditions on the project, and whether to impose other conditions of approval, when the relevant Boards and Commissions review this project for action. Limitations on the use of the ballpark for other special events may be a condition of the lease; the City could set up a process for authorizing special events. See discussion below under Neighborhood Protection Plan.

Comments

The DEIR should mandate that commitments are made, and assurance given that there is active representation and participation by neighborhood, merchant and community representatives in the following activities:

- Monitoring and enforcement of mitigation measures
- Development and ongoing update of a Transportation Management Plan
- Development and ongoing monitoring of implementation of a public improvement plan for needed infrastructure improvements, including traffic flow, pedestrian amenity, area beautification, parking, utilities, such as sewers, and others
- Development and ongoing operation of a maintenance district to assure prompt post event clean up and maintenance and repair of public infrastructure such as streets, street furniture and fixtures, and streets.
- Establishment of an oversight committee to monitor the impact of non-baseball events, with authority to recommend restrictions on such events should certain events prove disruptive to neighborhood livability standards. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

All such [mitigation] plans should be drawn up in a cooperative effort, including representatives of the Giants, appropriate city agencies and neighborhood representatives. Such cooperative planning should be defined as a mandatory mitigation measure under the DEIR. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

The boating community is an important part of the City, as is the Bay itself and the waterfront. Representatives of the maritime and environmental communities should be included in the planning process and their concerns addressed. (Abigail A. Grafton, M.A., M.F.C.C.)

The planned Ballpark site lies in direct proximity to the Mission Bay North Survey Area and has a direct effect on future planning considerations. As representatives of this future community, we request as an identified mitigation measure included in the Final EIR the inclusion of neighborhood groups in decision making and the ongoing process of managing neighborhood issues, included but not limited to traffic and transportation, event permitting and quality of life. We suggest that the Mission Bay CAC be represented in any such neighborhood advisory groups. (Anna Yee, Mission Bay North CAC)

However, no mutually acceptable agreement can be reached where neighborhood quality of life issues are not analyzed. And it cannot be done unless you, as Commissioners, specifically go on record as a part of this public hearing on the Draft EIR, to endorse the neighborhood representation positions called for here. We look to you to require active, enforceable, neighborhood representation as to all of these issues as a part of the certification of the EIR. (Rick Mariano)

There is no ongoing mitigation monitoring plan; There needs to be a plan as well as significant citizen, business, and property owner representation on the committee or group that does the monitoring. This monitoring group should be an ongoing group to last the life of the stadium. There must be an enforcement mechanism with teeth! (Michael Karasik, Bayside Village Associates)

The EIR should commit to the development of a comprehensive mitigation monitoring program. The objective is to have mitigation implementation mechanisms in place at the opening of the ballpark. Parties to the program should include all City agencies who will be involved in problem resolution including Parking and Traffic, MUNI, Public Works, Police and Fire, and Planning. The Rincon Point-South Beach Citizen's Advisory Committee (RP-SB-CAC) should also be included in discussion of the program. The mitigation monitoring program should designate a group to monitor the on-going effectiveness of the measures in place during early life of the ballpark and as long as conditions are evolving and adjustments needed. (James Ream, Co-Chair, Ron Blatman, Co-Chair, SPUR Ballpark Task Force; James Chappell, President, SPUR)

Since the non-transportation impacts of the Giants Ballpark may be more important than has been the experience at 3Com Park, it may be appropriate that this [Transportation Coordinating] Committee have a broader definition of responsibilities than simply transportation or, alternatively, two such committees should be formed, one to deal exclusively with transportation and one to address all other impacts. (Douglas G. Wright)

All such plans should be drawn up in a cooperative effort including representatives of the Giants, appropriate city agencies and neighborhood representatives. Such cooperative planning should be defined as a mandatory "mitigation measure" under the DEIR. (Martin Fay, Rincon Point - South Beach CAC)

The DEIR should recommend establishing a watchdog agency, comprised of at least 50% residents and merchants from the area, to have enforcement authority over the Mitigation Monitoring Plan. (Martin Fay, Rincon Point - South Beach CAC)

Establish a watchdog agency, comprised at least 50% by residents in the area, to have enforcement authority over the Mitigation Monitoring Plan referred to in I.B. above under Global Issues. (Michael Karasik, Bayside Village Associates)

The Giants will appoint a liaison representative to meet with the neighborhood groups regularly during operation of the stadium and in good faith shall work to resolve problems that occur. (Michael Karasik, Bayside Village Associates)

Somewhat analogous to the discussion of impacts, the DEIR's discussion of mitigation measures does not go nearly far enough in defining a mitigation planning process, organization, and the specific measures which not only could be, but should be, employed in the South Beach neighborhood. (Douglas G. Wright)

Too many mitigation measures are qualified by should, could, would, or might. It is impossible to determine what mitigation measures will actually be implemented. Consequently, with so many variables and assumptions, the probable environmental impacts cannot be quantified or identified. The DEIR must identify which mitigation measures are committed to. (Martin Fay, Rincon Point - South Beach CAC)

[U]nless there is continued monitoring of these issues [such as lighting] and enforcement of mitigation measures, the words in the EIR about mitigation will be meaningless. (John Anderson)

Response

The EIR sets forth possible mitigation measures to reduce or avoid potential significant adverse effects of the project, found in Chapter V of the EIR. The decision-makers will evaluate the proposed mitigation measures and would adopt a mitigation monitoring program at the time of project approval to implement those mitigation measures that have been made conditions of approval. That monitoring program will, as required by Public Resources, Code Section 21081.6, set forth each mitigation measure, the timing of the implementation of the mitigation measure and the agency or City department responsible for implementing and monitoring the mitigation measure. The mitigation monitoring program will be enforceable by City departments or other agencies. Other improvement measures, or proposed project elements that would reduce non-significant effects of the project, could also be required as conditions of approval of the project. The City decision-makers may wish to consider establishing a Neighborhood Protection Committee to monitor and solve problems as they arise; see Neighborhood Protection Plan, below. For discussion regarding funding mitigation measures, see Costs of Mitigation Measures, below.

Comment

Specific harbor-related mitigation measures must be identified and adopted to allow the facility to continue to operate as a City-wide resource, and for the marina tenants to continue to enjoy the use of the harbor. (Rick Mariano)

Response

To the extent the EIR identifies any significant environmental impacts on the harbor and marina tenants, the EIR recommends mitigation measures to address those significant

environmental impacts. If not a significant environmental impact, the EIR does not propose a mitigation measure. The EIR, and this Comments & Response Section herein, discusses project lighting, wind, and shadow effects; no significant adverse effects on South Beach Harbor activities were identified for those topics, and no mitigation measures were therefore proposed as part of the project or in Chapter V of the EIR. As discussed in Transportation and Circulation, Parking, *South Beach Harbor Area Parking*, parking improvement measures for shared access to parking at South Beach Harbors with several approaches could be used to reduce the possibility of Giants fans using that lot: special passes or card keys issued only to harbor tenants members (with some for guests) or signage enforced with fines or tow-away controls.

As described in Transportation and Circulation, Traffic Impacts, *South Beach Park*, traffic in the South Beach area would, in fact, be congested before and after games and would delay drivers wanting access to the South Beach Harbor area on game days. In the preliminary traffic routing plan described in the transportation mitigation measures, pp. V.12 - V.25 of the EIR, King Street would be closed between Second and Third Streets, but the Second/King intersection would be open with a parking control officer (PCO), who could assist with entrance/exit to the harbor parking area. Decision-makers could consider these and additional conditions to the project when the relevant Boards and Commissions consider approval/disapproval of the project.

Adequacy

Comment

The Transportation Mitigation Measures suggests one plan. This plan includes the closing of King between Second and Third Streets along with the Lefty O'Doul Bridge. This will include a mandatory detour down King at Third towards Fourth to avoid the closed streets. (DEIR V.9) Fourth between Townsend and Third (in Mission Bay North) would be one way southbound before the game and one-way north bound after the games (DEIR V.12, 13, 14). The Transportation Mitigation Measure is inadequate and the conclusion of its effectiveness is erred for the following reasons.

Lacking a Range of Measures: An EIR must consider a comprehensive range of mitigation measures for an identified impact to give the implementing agency a choice. Since the DEIR offers one transportation mitigation measure, it does not meet this requirement. Other Transportation Mitigation Measures must be developed and set forth. (David P. Cincotta, representing China Basin Landing, Ltd.)

Response

It is not clear that a range of mitigation measures is required in an EIR. Nonetheless, Chapter V in the EIR includes a group of transportation mitigation measures that, implemented together or in part, would reduce significant transportation impacts. One of the transportation mitigation measures suggests setting up a Committee to implement and monitor a transportation management plan (see pp. V.4 - V.5). The traffic routing plan set forth in Chapter V of the EIR is an example of a traffic routing plan plus improvement measures which reduce traffic impacts before and after events at the ballpark to an identifiable level. The preliminary traffic routing plan would serve as a basis for a final traffic management plan if one is included in the adopted conditions of approval. As the project is underway and the City and the Giants are able to gather information about actual traffic patterns and impacts, the traffic routing plans may need to be changed. The Transportation Coordinating Committee would be able to respond to needs as they arise; this is explained further in Transportation, Transportation Mitigation, *Ballpark Transportation Coordinating Committee*.

Other transportation mitigation measures include additional transit service such as ferry service to the ballpark (p. V.43), a travel demand management plan, a motorist information service (p. V.45), and various transit mitigation measures (pp. V.48 - V.54).

Comments

Among the issues that should be addressed in the mitigation monitoring program are the following:...Physical impacts on neighborhood residents, commercial enterprises, infrastructure and the South Beach Marina; light and noise; maintenance, including trash and graffiti control; physical and property security...(James Ream, Co-Chair, Ron Blatman, Co-Chair, SPUR Ballpark Task Force; James Chappell, President, SPUR)

General infrastructure upgrades due to the new stadium are needed but not addressed. (Michael Karasik, Bayside Village Associates)

We understand that a mitigation monitoring plan will be developed along with the Final EIR. We believe that plan should specify four distinct responsibilities: (1) a fully funded construction monitor not retained by the Giants, but rather responsible to the City and neighborhood, to monitor construction mitigation measures; (2) a Transportation Management Committee, made up of City agencies, the Giants and neighborhood representatives, with duties as described in the DEIR; (3) a neighborhood maintenance district with a dedicated funding source, such as employed at Yerba Buena Gardens, to monitor compliance by the Giants with non-transportation mitigation measures and serve as the provider of off-site security and neighborhood maintenance; and (4) a non-baseball events committee, made up of City and neighborhood representatives, to determine which non-baseball events will be permitted at the ballpark. (Steven L. Vettel, Gladstone & Vettel)

Among the issues that should be addressed in the mitigation monitoring program are the following:...Emergency access to the park and neighborhoods. (James Ream, Co-Chair, Ron Blatman, Co-Chair, SPUR Ballpark Task Force; James Chappell, President, SPUR)

Response

While not all of the impacts proposed in these comments constitute significant environmental impacts which will be addressed in a mitigation monitoring program, the decision-makers may condition the project, when they consider approval/disapproval of the project, to address other neighborhood and City impacts.

Neighborhood Protection Plan

Comments

...instruct the authors of this Draft EIR to revise the document to include a serious analysis of the impacts of the ballpark on the neighborhood, and to call out specific mitigation measures. (Rick Mariano)

The Giants should appoint a community liaison representative as a full time contact available to take calls and meet with the neighborhood and business groups regularly during operation of the stadium. The Giants should commit in good faith to work to resolve problems that occur, and work to maintain and enhance overall neighborhood appearance and cleanliness with respect to litter and graffiti and work toward implementing neighborhood improvement and beautification projects. (Martin Fay, Rincon Point - South Beach CAC)

It is our view that the DEIR is inadequate because the "Project Definition" is too narrow. The "Project Definition" should not only include the physical aspects of the new ballpark and the transportation, vehicular access and parking facilities that make it work, but also a "Plan

to Protect Affected Adjacent Neighborhoods." The DEIR does not incorporate neighborhood character and quality of life standards, as part of the "Base Project Definition." It should. We feel it must. (Rick Mariano)

Specific "Area Plan Assumptions" the DEIR must analyze include... A plan that defines and mandate the practice of good neighbor policies by ballpark operators to insure the protection of neighborhood quality, livability and character. (Martin Fay, Rincon Point - South Beach CAC)

Specific "Area Plan Assumptions" the DEIR must analyze, include... A plan that provides standards to ensure that impacts caused by... fan generated litter and graffiti... are appropriately acknowledged and addressed by specific project sponsor and city agency commitments. (Martin Fay, Rincon Point - South Beach CAC)

[A] plan that provides standards to ensure that impacts caused by...fan-generated litter and graffiti are appropriately acknowledged and addressed by the specific project sponsor and the city agencies. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

Although mitigations are identified for individual issues as described in Mitigation, General, the commentors are suggesting a broader "neighborhood protection plan" or "good neighbor program" that could provide for a coordinated approach to minimize neighborhood impacts of activities at the site. Such a program would not technically qualify as "mitigation" under CEQA in that it could serve to reduce nuisance effects such as localized trash or noise impacts that are not, in themselves, substantial physical impacts on the environment. Nonetheless, the proposal could be an effective means to implement and monitor local actions to improve conditions in the vicinity when events occur at the ballpark. See discussion regarding neighborhood effects in Land Use, Neighborhood Effects/Quality of Life.

The following improvement measures are added to the EIR following the discussion of "Neighborhood Effects" that has been added following the last full paragraph of p. II.23.

Improvement Measure

- **The Port Commission could establish a process to require special authorization for use of the ballpark for non-baseball events to minimize possible adverse effects on the neighborhood. Issues that might be considered in authorizing such events could include ending times for concerts and/or other responsibilities that could be imposed to minimize ancillary effects such as increased litter or noise.**

- **In order to address concerns arising from ballpark and event activities the Giants could identify a community liaison who would be made known to neighbors and other concerned parties. The community liaison could establish a committee including representatives from the neighborhood and appropriate city agencies to develop measures that could be implemented to minimize undesirable non-significant impacts that might occur during events at the ballpark.**

Costs of Mitigation Measures

Comments

The voters last year were told this project would require no public subsidies, create thousands of well paid jobs and improve the environment. All these assertions, after one reads this draft EIR, is clearly false. This unnecessary and irresponsible project will create an environmental and fiscal nightmare for the city, as documented in this EIR. A few, the 22 wealthy owners of the Giants want excessive profits and huge public subsidies at the expense of the rest of us.

To implement this large scale development project in this small confined space will require tens of millions of dollars of public subsidies, and it still won't work. Its ultimate price tag for the public is unknown because the stadium promoters have refused to disclose the information.

Why are we being asked to subsidize multimillionaires for an environmentally unsound project? It is because new stadiums are built for largely well-heeled fans, lavish luxury boxes for corporate entertaining and new revenue streams for team owners. This document identifies numerous infrastructure public services and other costs that will require large public costs. The EIR needs to disclose all the public costs for this project at this site. That means infrastructure, listing all the items on a schedule, public services, listing all the items, financing services, listing all of those items. And then we need to include one time cost, annual cost, total cost over 25 years. Then who is going to pay for it. What is the breakdown between public cost share and private cost share for all that.

That's not in this report. Obviously, it needs to be included. (Joel Ventresca)

Responsibility for and funding of mitigation measures. It appears that many mitigation measures are not incorporated into the project because the party responsible for implementing and/or funding them has not been identified. For decision makers to be in a position to approve the project, they must have this funding information, so that they can determine whether the mitigation measures recommended by the DEIR or in EIR comments are feasible. Accordingly, the EIR (or a companion document) must... identify what agency (if other than the Giants) will implement the measure. (Steven L. Vettel, Gladstone & Vettel)

Public Money: The stadium is to be built with no public money. Where is the money for all the mitigation to come from? (Janet Carpinelli)

It is unreasonable that no estimated mitigation costs have been brought to light...The Redevelopment Commissioners should instruct their staff to develop a total design package, including cost and finance issues and develop an EIR for that project. This must be done in concert with the BCDC and Cal Boating. (L. Joseph Boss)

This stadium has been passed on huge amounts of corporate spending and political pressures. The Giants now have their stadium, but it's up to you to protect the vitality and health of our city as the Giants are only concerned about their bottom line. I urge you to make the Giants financially responsible and publicly liable for the problems they create. (Nancy Anding)

Responsibility for and funding of mitigation measures. It appears that many mitigation measures are not incorporated into the project because the party responsible for implementing and/or funding them has not been identified. For decision makers to be in a position to approve the project, they must have this funding information, so that they can determine whether the mitigation measures recommended by the DEIR or in EIR comments are feasible. Accordingly, the EIR (or a companion document) must quantify the costs of mitigation measures... (Steven L. Vettel, Gladstone & Vettel)

As another matter. Many of the items I have noted are going to cost the taxpayers to fix, not the Giants. Please, make them take care of their own mess, not me. (Maria Woodard, Orville Pitney, John H. Super)

Cost analysis has not been included in this study. What are the plans for addressing the mitigation costs and for developing cost sharing agreements about how to pay for them? Will the CAC have a role in this process? (Diane Nygaard)

No cost figures are given for mitigation measures. It is impossible to make judgments as to the relative cost effectiveness of, or likely funding for any given mitigation measure. A host of mitigations rely on actions for which there are no identified resources, nor commitments. How can the public or decision-makers be certain that mitigation measures have any basis in

economic reality? Cost information and likely funding sources must be provided by the DEIR. (Martin Fay, Rincon Point - South Beach CAC)

I would hope in examining the mitigations and other issues that are going to be cost-related items, that there be some examination of what those costs are, so that there will be some idea as we get to the Board of Supervisors with this issue of what the costs may be to the City of San Francisco or to the Giants in terms of these mitigations. (Jim Firth)

[I]dentify any funding shortfalls. The EIR (or the companion document) should also quantify the increased revenue any agency may realize from operation of the ballpark (such as ground rent to the Port, increased possessory interest taxes, sales taxes and parking taxes), so that decision makers are able to assess whether these agencies are in a position to be required to fund and/or enforce mitigation measures. (Steven L. Vettel, Gladstone & Vettel)

The DEIR indicates a large number of "F" rated, congested intersections. Section V, Mitigation Measures includes control measures, which will not be provided by the project sponsor, but paid for by the City. We suggest that the funds to pay for this mitigation come from Ballpark, BP, parking fees.

We support the suggested mitigations of enhanced MMX, bus bridge, Caltrain and the ferry variant transit services. Muni's difficulty in collecting fares after ball games is also an additional cost of service. Again these additions to service should be paid for by those who choose to drive and park near the BP. (Howard Strassner, Chair SF Group, Sierra Club)

The transit incentive program is a good start but does not go far enough: The Sierra Club agrees that the major traffic/transit mitigations to this project must be implemented by the City. However we recommend that the City form a Special Parking District in order to collect a Parking Surcharge or Traffic Mitigation Fee, TMF. The total TMF should be enough to cover all of the costs of mitigation including: additional transit costs, capital cost of signs and minor street changes, a portion of affected neighborhood residential parking permits and additional Parking Control Officers, PCO, costs (mentioned in V.4). The TMF should be set jointly by the Public Transportation and the Parking and Traffic Commissions with the approval [of] the Board of Supervisors, similar to setting a fare or parking rate.

Almost every one says that they would use transit more, it if were: more convenient, closer to automobile speed and reasonably prices. Attempting to provide these requirements to any degree requires transit subsidies. Money is not readily available. In San Francisco the people voted to use parking taxes to help subsidize Muni. TMF is a small extension of that concept. San Francisco is a Transit First City and the limited supply and high cost of parking downtown encourages a high percentage of transit users. The subject DEIR include a large number services to be provided by the City and others. Since the Giants said the Ball Park would not cost taxpayers anything, the TMF will be the source of funds for all of these additional services.

Initially, predicting the extra costs to be incurred for transit will not be precise; but after some experience the costs will be well known. Suppose that the Commission or transit providing Agency for each of the providers of mitigation services, including: AC, BART, Caltrain, Golden Gate, Muni, SAMTRANS, charter bus services and various ferries certifies the necessary additional service to be provided and the cost of the service. The Giants, because they will have to pass the cost on to their parking patrons should have ample opportunity to review the service proposals and make their comments at public hearings. If the Giants adequately market the use of transit, the services should be well used and with adequate planning the subsidy may not be too great. Initially the Giants should help by surveying their fans. During the season the Giants will probably want to check on transit utilization on each system, to help make plans for future seasons and to verify costs.

We agree that [there] should be no additions to highways or streets to facilitate automobile movement. However, there will be additional costs for new signs, minor street and sidewalk modifications and new signal lights to establish transit preferential streets and designated safe and convenient pedestrian and bicycle ways. TMF should pay for all of these capital costs over a short time by those who choose to drive and park.

The TMF should be in addition to the San Francisco parking tax, because the tax is only used for existing SF transit. The TMF should be imposed on all of the Giants' parking lots and all nearby lots, that will open for BP parking, based on distance from the BP. This may be difficult, but the alternative is windfall extra parking fees, for some lot owners, and a higher TMF for those who park in the Giants' parking lot. In addition, if there are any nearby curbside parking spaces, (not necessary for bicycle or pedestrian movement and not included in residential or neighborhood commercial parking areas) these spots could also be rented, by the Giants, at parking lot rates for ball games. All of this money should go to the SF General Fund, less a sales commission. (Howard Strassner, Chair SF Group, Sierra Club)

A funding source must be identified for recommended sidewalk installations and improvements. (James Haas)

p. V.69 Litter control Please identify source of funding. (Jeffrey Leibovitz)

Who will pay for the additional required community services such as police, fire and emergency medical during baseball season? (Babette Drefke, Potrero Boosters & Merchants Association)

The cost of security should be written into the plan for the ballpark in a way that binds the organization in future years. (Doug Gooding, CAC member)

I want to talk about who is going to pay for some of this mitigation such as the transportation plan and a neighborhood maintenance district that some people have suggested. The Giants said they can't afford it. I understand that. I think the Redevelopment Agency really needs

to step to the plate here. The city is getting increased tax increments from this project. The city is getting increased sales taxes from this project. The city has got to step forward and say, yes, we will use some of that incremental money to mitigate these impacts on the neighborhood. No one has done that yet. We cannot the -- Giants and the neighborhood can't do this alone.

The city has got to step to the plate and participate in developing these mitigation measures and participating in funding these mitigation measures. So, I would ask particularly the agency which has an investment in this area, after all this is your project area -- for example, my client's development was funded by bonds issued by the agency. You really need to protect your asset and work with us to fund these mitigation issues. (Steve Vettel, Bay Side Village Associates)

But before anything can be accomplished, the DEIR needs more work to precisely know how 42,000 fans are going to fit on our narrow congested streets and sidewalks along with the existing uses that have just as much right to be here as they do. Other cities have accomplished this successfully by using unlimited funding resources (taxpayer dollars). We on the other hand have no allocated funding sources, severely restricting mitigation allowances, which means that the pedestrian pathways and traffic patterns must be clearly identified to even know which sidewalks to widen and how residents and businesses can continue to use the avenues to their properties on event days. (Louise Bird)

We need to have the transportation mitigation costs released and the management plan developed. Now, the Giants have said over the last week: Don't worry. We have two years to develop that.

I don't think this committee feels that is good enough. We need to get a number of things pinned down before or during the time that the EIR is prepared and that the conditional use and other permits are developed. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

[R]ecognizing the vital importance of effective transportation, it is imperative that we work together on this management plan, and that it be done now and not later, and that the funding for it be developed and identified now and not later. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Sources of revenue and responsible agencies for the mitigation must be identified. (Philip DeAndrade, Mission Creek Harbor Association)

According to the DEIR, decision-makers will have all the information on mitigation costs by the time of project review and approval. Commissioners is this true? You will certify the EIR as accurate. Will this statement on mitigation costs still be in the Final EIR, or will it be dropped? (James Haas)

When will transportation mitigation cost figures be released? (James Haas)

The traffic management plans would attempt to redirect traffic in one direction before and the other direction after every game. To do this, for example, some streets would become one way in one direction for a couple of hours, and one way in the other for a while. All over the area, there would be hour by hour changes in allowed use of the streets and at each such place officers would be stationed to enforce compliance and in many cases movable barricades would be put in place by city workers.

This complicated routine would be carried out every ball game day and/or evening for the entire season. It will cost the city an immense amount of money and drive the regular users of the streets out of their minds. I plead with the members of the Planning Commission to take this reality very seriously, to remember that when S.F. voters approved the stadium measure, it was on the grounds that it would not cost the taxpayers any money. (Charles Clark)

It is also the responsibility to fund the cost of implementing that plan [for the South of Market]. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

[A]ny parking revenue generated by the Giants should be used to defray transit costs. (Jennifer Clary, San Francisco Tomorrow Waterfront Committee)

[G]o to 3 Com Park and look where the fans come from, the Giants acknowledge that 70 percent come from outside the city. You can acknowledge -- you can look and see the traffic for yourself. You can see what is happening in the nearby neighborhoods and the parking. So, please do not rubber stamp this. Go to the games and really think about how this is going to affect the people who live here. Make the Giants responsible, financially responsible and publicly liable for the problems they are going to create. (Nancy Anding)

Page V.4: The fiscal magnitude of the capital and ongoing operational costs of the proposed mitigation program must be determined, and funding sources identified. If the Giants expect public agencies to bear these costs, which we believe is appropriate in many cases, the EIR should identify potential sources of public funding, such as increased sales, possessory interest and parking tax increments associated with the ballpark. (Steven L. Vettel, Residential Properties Group)

Funding sources to operate expanded transit service should be identified. (Doug Kimsey, Metropolitan Transportation Commission)

IV.83, Transit Improvements: The "ballpark special buses" are excess vehicles retained in MUNI's reserve fleet. Retention of these vehicles for such limited uses is an additional public cost. Extra vehicles required for the ballpark should be paid for by the project sponsor, or the service should be privately contracted for.

Current service for ballgames to 3COM park costs San Francisco taxpayers about $1 million per year. The EIR should clearly identify the level and cost of existing service, and the level and cost of that proposed for the new ballpark including increasing MMX to 4 car trains.

MUNI service cuts in other areas to provide ballpark service would cause increased traffic congestion and pollution that has not been included in this analysis. (Diane Nygaard)

Page III.71 discusses night service that ends earlier than most night games. If service is extended, who pays for the extra cost of accommodating the Giant's fans or attendees at events? (Mariuccia Iaconi)

(IV.82) Muni will experience more operating expenses than they would have without the proposed stadium. Who pays for this? The stadium was touted as no cost to the citizens of San Francisco.

(IV.83) Service in other areas of San Francisco will [be] temporarily reduced in order to provide 4 car MMX service to and from the stadium. This is ridiculous! The people of San Francisco should not be deprived of service in order to meet the needs of a for-profit corporation. Muni service is much criticized all over the city; this will only add to the bad service experienced by many people. (Mariuccia Iaconi)

Analysis presumes additional BART service (Page I.33 and IV.82): The introduction section states that there would be a "need for 2 to 9 additional BART cars during the 3:30 to 4:30 p.m. weekday afternoon and 4:00 to 5:00 weekend afternoon periods to accommodate ballpark demand." This additional service, as inferred on Page IV.82, would result in "Muni and other transit operators experiencing increases in operating expenses that they would not have experienced without the ballpark. In addition, the need to move high volumes of passengers quickly would create difficulties in the actual collection of fares..." The provision of extra-long trains for ballpark service requires that they operate at times and in areas where their length is not needed. This incurs an added cost to the transit operator. These changes to the BART system should be considered impacts to BART. As a result, mitigation for these impacts should be provided by the project sponsor. The DEIR identifies the use of Parking Control Officers (PCOs) as a mitigation for ballpark traffic control. Presumably these PCOs would be funded by the ballpark owner. In a similar manner, transit operators will require additional staff to manage ballpark crowds and should be compensated for their use. (Karita Zimmerman, Manager, Environmental Compliance, BART)

p. IV.176, Municipal Railway - The section ends with the statement "Absent additional funds, service in other areas of the City might need to be temporarily reduced somewhat in order to accommodate ballpark demand on some game days." This is not acceptable to Muni nor is it logistically feasible. Any extra ballpark service would tax Muni's current annual budget and result in general reductions in service if the ballpark increment is not ndependently funded. More realistically, a funding source needs to be established to provide

the service necessary to support the ballpark. As the "PacBell Ballpark Transportation Report" accurately notes, this funding is not currently in place...

p. IV.189, Muni Metro Extension - As noted, Muni plans to operate the single car J-line trains on the MMX. In the peaks, two-car M-line trains would also offer service on the MMX to the CalTrain Station. Also see IV.83.

The report notes "...absent additional funds, additional ballpark service could result in some reduction in system-wide capacity on game days." Again, this is not a feasible approach (nor an acceptable one). The section should include a clear statement of the need for additional funds to provide the service. See IV.176 above and V.43 paragraph 2 below.

While redeployment of bus services from 3COM Park to the Bus Bridge are project related, extra MMX trains and the extension of the 38L to the stadium are mitigation measures. At this point, funding is unclear and providing the service may not be logistically feasible. (Peter Straus, Manager of Service Planning, Muni)

The traffic management plans would attempt to redirect traffic in one direction before and the other direction after every game. To do this, for example, some streets would become one-way in one direction for a couple of hours, then one-way in the other for a while. All over the area, there would be hour by hour changes in allowed use of the streets, and in many cases, movable barricades would be put in place by city workers. This complicated routine would be carried out on every ballgame day and/or evening for the entire season. It will cost the city an immense amount of money and drive the regular users of the streets out of their minds. I plead with the [members of the Planning Commission] to take this reality very seriously, to remember that when SF voters approved the stadium measure, it was on the grounds that it wouldn't cost the taxpayers any money... So I believe that building a ballpark at the China Basin site is not altogether and forever impossible, but that at this time it would be a dreadful mistake, heaping huge expenses on the city's taxpayers and causing traffic chaos for years to come. (Charles M. Clark)

The DEIR does not provide information on the capital and operating costs of the array of potential mitigation measures discussed. The DEIR indicates that many such measures are not the responsibility of the project sponsor, but are rather the responsibility of various departments of San Francisco government (page V.4). Identification of the capital and/or operating costs of mitigation measures, as well as determining the party responsible for paying, must be made a critical part of the mitigation measure planning process to be carried out by the Coordinating Committee.

It is very important that mitigation financing matters not be delayed until experience with the ballpark operation defines appropriate needs, since the lead time for procurement of capital items by San Francisco government is often lengthy. Similarly, management of human resources by City departments requires adequate lead time in terms of the City's budgeting process. Of course, adding the possibility of the Giants contributing to, or being responsible

for, any number of mitigation measures, also demands proper lead time. (Douglas G. Wright)

Specific sources of revenue and responsible agencies for the mitigation must be identified. (Philip De Andrade, delegate of Mission Creek Harbor Association)

The burden of shifting ridership onto transit should fall onto the Giants. One possible funding mechanism -- a parking surcharge (e.g. $5) imposed on all lots within the "parking shed" for the ballpark on days of games. Collected with parking tax and dedicated to provision of free transit shuttle. (Sue C. Hestor, Bayside Village Associates, South Beach Marina Apartments and Reliance Development)

Page IV.82, MUNI: MUNI estimates its additional cost to operate the bus bridge and added MMX capacity at over $1,000,000 annually, with income of only $200,000 (February 27, 1996 memo from Philip H. Adams to Rudy Nothenberg, appendix I-12). The Draft EIR should quantify this revenue shortfall and discuss how the gap could be filled. Will the Giants subsidize this service if the MUNI budget cannot?

Page IV.83, CalTrain: The Joint Powers Board has merely indicated that it is "committed to working with the San Francisco Giants to develop a service and financing program" for its additional service (Resolution No. 1996-39) (appendix I-14). The Draft EIR must quantify the added cost to Caltrain of providing this service and discuss how it will be paid for. Will the Giants subsidize this service if the JPB budget cannot?

Page IV.83, MMX: DEIR states service in other areas of the City would need to be reduced to provide four-car MMX service unless new funding is found. The DEIR should discuss whether that is a feasible, and if not, what funding alternatives exist.

Page IV.83, F-line: Direct service from ballpark to Fisherman's Wharf should be considered a necessary component of the project. Is there a funding shortfall for the trackage necessary to implement that service? If so, what funding options are available? (Steven L. Vettel, Residential Properties Group)

Page IV.176, MUNI: Is it feasible to reduce service in other parts of the City in order to meet demand associated with the ballpark, absent new funding? If not, what alternatives exist for new funding? Will the Giants subsidize MUNI service to the ballpark if MUNI is unable to do so? (Steven L. Vettel, Residential Properties Group)

Page V.5: All traffic signals in the vicinity of the ballpark should be on the same computer system located in and operated from a central command post within the ballpark.

Page V.5, Traffic routing: The routing strategy should include routing traffic away from predominantly residential streets, as well as away from the area immediately adjacent to the ballpark. Brannan and Townsend Streets between Second and the Embarcadero, Delancey

and Beale south of Bryant, and the lower (southern) portion of Bryant Street between Beale and Delancey should be reserved for local residential and business traffic.

Page V.7, It is unclear how "passive barriers" would prevent ballpark patrons from using residential streets. There must be a more reliable means to restrict these streets to local traffic, such as PCO's at the key barrier points. (Steven L. Vettel, Residential Properties Group)

The EIR analyses should develop cost estimates for all capital and operating expenses associated with mitigating the transportation impacts of the proposed ballpark: p. IV.83 MUNI MMX Who will pay for the 4 extra MUNI cars; p. IV.189 Please identify sources of funding for operating four-car MMX; p. IV.191 Please identify sources of funding for operating SEVEN additional MUNI buses; p. IV.223 Please identify sources of funding for Pedestrian/Bicycle Improvements along Third Street and Second Street.

p. V.26-31 Please identify sources of all permanent roadway and sidewalk Improvement funding.

p. V.55 Please identify source of funding for improving the surface of the Lefty O'Doul Bridge. (Jeffrey Leibovitz)

Response

The EIR proposes mitigation measures in Chapter V, pp. V.1 - V.74. Those measures include substantial measures to reduce traffic impacts, transit impacts, pedestrian impacts, air quality impacts, noise impacts, water quality impacts, lighting impacts, seismicity impacts, cultural resource impacts, and construction impacts. Decision-makers will consider the imposition of these measures as conditions on the project, as part of the mitigation monitoring program. At that time, decision-makers must consider the feasibility of each mitigation measure. Feasibility determinations include, among other things, an assessment of the costs and an assessment of the current or future availability of funding to pay for each mitigation measure. In addition, the mitigation monitoring program will identify the City department or other agency responsible for implementing the mitigation measure.

There are a number of possible sources of funding for necessary mitigation measures. First, the Giants/City term sheet provides that the property tax increment generated from the project (exclusive of the affordable housing set aside and the statutory allocation for other

public agencies) will be made available to finance public improvements needed in connection with development of the ballpark. Second, the project may generate additional income to the City in the form of payroll taxes, sales tax, a parking tax and an admissions tax. Third, the City could require the project sponsor directly to finance a portion of necessary public improvements. Fourth, the City, or any City department, could budget necessary public improvements or services as an allocation from the City's general fund.

The comments also request information on socioeconomic effects of ballpark activities. As discussed in CEQA Guidelines Section 15131, socioeconomic information can be used to trace a chain of cause and effect on physical environmental conditions; changes in socioeconomic conditions in themselves are not considered significant effects, and are not required analyses in an EIR.

For discussion regarding Proposition M, see the Response in Consistency with Existing Plans and Policies, Consistency with Existing Plan and Consistency with Existing Policies, Priority Policies - Planning Code Section 101.1 (Proposition M) of this document. For discussion regarding litter effects, See Initial Study, Litter Mitigation.

Community Service/Remediation Costs

Comments

No discussion of neighborhood maintenance district which will be necessary due to transient pedestrians, buses, autos, and vendors which will necessarily result in litter, graffiti, and related impacts on the neighborhood. (Michael Karasik, Bayside Village Associates)

No mention is made of litter, broken bottles and other debris being deposited on the area's streets and sidewalks as an entirely predictable byproduct of two or three million ballpark patrons walking to and from the ballpark. In Denver, a maintenance district was set up and funded to accomplish neighborhood cleanup nightly, or no later than the following morning after a ballgame or other ballpark event. Such a funded maintenance district must be set up for our neighborhood. (Rick Mariano)

The DEIR should require the establishment of a funded maintenance district for litter and graffiti removal. A source of funding should be identified. (Martin Fay, Rincon Point - South Beach CAC)

Response

The neighborhood maintenance requirements identified by the commentors are non-environmental issues that are not required to be analyzed in a CEQA document. Litter, additional security needs, and graffiti are not physical environmental changes as defined by CEQA.

A neighborhood maintenance district may be one method to pay for some of the mitigation measures or other costs to alleviate other impacts of the project. For additional information regarding the funding of mitigation measures, see Page 6. See Initial Study, Community Services, for discussion regarding litter and other potential effects of the ballpark. See also Mitigation, Neighborhood Protection Plan.

Comment

The project sponsor should be required to pay for cleaning and protection of the boats and the Harbor waters from debris generated by the Stadium activity. (L. Joseph Boss)

Response

Impacts from debris are discussed in Air Quality, Construction. Generally, the project contractor would be required to minimize, if not eliminate, impacts from construction activities to the surrounding area. Litter in South Beach Harbor is discussed in Water Quality and Aquatic Ecology, Litter in the Channel and Bay. Operational impacts from the ballpark. For information regarding the funding of mitigation measures see Mitigation, Cost of Mitigation Measures.

Comments

Table 5-1, Summary of Recommended Improvements - If implemented, who would fund the proposed ticket machines and the any potential modifications to the right-of-way to allow for

street-side boarding on the MMX? We assume they would be part of the project. (Peter Straus, Manager of Service Planning, Muni)

p. IV.176, Municipal Railway - The section ends with the statement "Absent additional funds, service in other areas of the City might need to be temporarily reduced somewhat in order to accommodate ballpark demand on some game days." This is not acceptable to Muni nor is it logistically feasible. Any extra ballpark service would tax Muni's current annual budget and result in general reductions in service if the ballpark increment is not independently funded. More realistically, a funding source needs to be established to provide the service necessary to support the ballpark. As the "PacBell Ballpark Transportation Report" accurately notes, this funding is not currently in place...

p. IV.189, Muni Metro Extension - As noted, Muni plans to operate the single car J-line trains on the MMX. In the peaks, two-car M-line trains would also offer service on the MMX to the CalTrain Station. Also see IV.83.

The report notes "...absent additional funds, additional ballpark service could result in some reduction in system-wide capacity on game days." Again, this is not a feasible approach (nor an acceptable one). The section should include a clear statement of the need for additional funds to provide the service. See IV.176 above and V.43 paragraph 2 below.

While redeployment of bus services from 3COM Park to the Bus Bridge are project related, extra MMX trains and the extension of the 38L to the stadium are mitigation measures. At this point, funding is unclear and providing the service may not be logistically feasible. (Peter Straus, Manager of Service Planning, Muni)

Also of concern is the document's implication that impacts on transit systems should be mitigated by the transit operators themselves. The incremental impact and cost to BART should be considered and mitigated by the proposed project. (Karita Zimmerman, Manager, Environmental Compliance, BART)

Response

f MUNI or BART informs the City that there will be no available funding for these neasures, or that reduction in services is not a permissible method to provide needed service or the project, the decision-makers can consider other methods to pay for the measures and ssess the likelihood that funding can be made available in the future. For general nformation regarding the funding of mitigation measures, see Mitigation, Cost of Mitigation leasures.

Comments

The DEIR must identify specific mitigation measures, including cost and funding source should be identified and committed to by the project sponsor and the city to assure that priority policy mandates will in fact be honored. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

It is essential that the city provide sufficient resources, infrastructure and management (Proposition M) to cushion the neighborhood from some of the factors that can impact. (Elizabeth Carney)

Response

The EIR has identified mitigation measures to reduce significant environmental impacts. Those measures will be evaluated by decision-makers for feasibility, which includes the question of funding for the mitigation measure. Other issues, such as the Priority Policies, may be separately addressed by the decision-makers when they consider approval of the project. The Priority Policies do not address issues which are strictly environmental issues for purposes of CEQA. For additional information regarding funding of mitigation measures, see Mitigation, Cost of Mitigation Measures.

Summary, pp. I.47 - I.55 will be revised in the Final EIR to reflect the final status and listing of all mitigation measures.

VARIANTS TO THE PROPOSED PROJECT

Ferry Service Variant

Comment

Page VII.1: During the Prop. B campaign, a ferry terminal at Pier 46B was shown as an element of the project. Such a terminal should be a required mitigation measure, not solely up to the Giants. (Steven L. Vettel, Residential Properties Group)

Response

Proposition B does not include a ferry terminal as part of the ballpark project, but refers to potential ferry service from various North Bay and East Bay points. As a result, ferry service is addressed as a project variant, on pp.VII.1 - VII.8 of the EIR. Ferry service also appears as a Transportation and Circulation mitigation measure under consideration by the project sponsor, on pp.V.41 - V.42 of the EIR. Much interest in the Ferry Service Variant has been expressed by the project sponsor, the existing ferry service providers, the public, the City, the Port, and the Redevelopment Agency. However, it must be pointed out that there is no existing City-controlled ferry service provider. All providers of ferry services are privately owned or based outside San Francisco. Consequently, it is not within the City's power to "require" the provision of such service as a condition of project approval. Nonetheless, the project sponsor is actively pursuing this option with ferry operators and with potential funding providers, because of the high level of interest in having a ferry landing at the proposed ballpark.

Comments

District staff believes the "Future Phase 2 Optional Breakwater" shown in Figure VII.A.1 (page VII.2) to be more useful then the "Optional Free Standing Breakwater."

Although the new Golden Gate Ferry vessel is not designed to load patrons from a floating dock (page VII.4), a provision is provided on this vessel that could allow loading of patrons into the main deck which is approximately 8.2 feet above the waterline. (Jerome M. Kuykendall, Director of Planning and Policy Analysis, Golden Gate Transit)

In addition, we believe the information in the DEIR is inadequate for BCDC standards. For instance,... the ferry dock has to be shown... (Martin Fay, Rincon Point - South Beach CAC)

Response

A ferry terminal is not part of the project as currently proposed. It is a variant of the proposed project that is under consideration by the project sponsor and the City. Designs for a ferry terminal, including its breakwaters, therefore, are preliminary in nature, and subject to review by the City, the Port, the Redevelopment Agency, and the transportation agencies that could be using them. The above suggestions regarding the breakwaters and the loading facilities have been forwarded to Moffatt & Nichol Engineers (ferry terminal engineers) for their consideration as part of the terminal design.

Figure VII.A.1 on p.VII.2 of the EIR shows a conceptual view of the ferry landing, accompanying the description beginning on p.VII.1 of the EIR. This is adequate for the purposes of the EIR. If readers wish to view some of the components of a similar landing, Pier ½ is the most easily accessible. Pier ½ differs in that it is perpendicular to the shore rather than parallel to a bulkhead, but the ramps, guide piles, decks and gates will provide the viewer with an idea of what the elements of the landing would look like. Additionally, it should be noted that if, and when, ferry service to the ballpark is implemented, BCDC would review any application for a terminal, based on BCDC procedures, and would request whatever information they deemed necessary to make a decision. More detailed diagrams of the float, ramps, gates and guide piles would be part of that information package, as well as information on operating schedules and procedures.

Comments

The environmental impacts on South Beach Harbor warrant specific attention. Impacts on this most immediate neighbor of the new ballpark have been seriously overlooked. The marina was treated as though it weren't even there. This reflects an inadequate understanding by DEIR authors of the marina's function and role as a recreation and open space resource... The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... Wind impacts on boats moored out in the harbor are not adequately

analyzed. Impact of wave action and surges from ferries on moored boats and breakwater was not analyzed...

In addition, we believe the information in the DEIR is inadequate for BCDC standards. For instance... any conflict between ferries and marina based boats using the same access channel must be analyzed, and appropriate mitigation measures adopted. (Martin Fay, Rincon Point - South Beach CAC)

Impacts on Ferry boats to the breakwater and surge caused within the Harbor needs to be studied. (L. Joseph Boss)

Impacts on use and enjoyment of the South Beach Yacht Harbor are also not adequately covered, including...ferry induced wave surges... (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Ferries will obstruct the use of the channel for pleasure boating and racing. (Janet Carpinelli)

Amazingly, no mention whatsoever is made of the potential impact of ferries approaching China Basin, who will have to pass very closely by the south entrance to the harbor. We believe this will become a very popular method to reach the ballpark, particularly in light of the traffic problems likely to be encountered by land. This will mean a significant number of vessels in a shallow and restricted area. (Doug Gooding, CAC member)

Response

According to the Harbormaster at South Beach Harbor, the arrival and departure of ferries at the proposed ballpark would pose no problems that have not already been resolved at other harbors where commercial and pleasure craft share the waterways. The establishment of a "slow bell" (no-wake) zone, as currently exists at Pier ½, would prevent the wakes of larger, faster-moving ferries from endangering smaller or slower pleasure boats. Placement of traffic buoys and observance of the Coast Guard Navigation Rules (already required, but not always adhered to), would reduce the possibility of collisions when entering or leaving the marina and harbor. Providing the ferry schedule to boat owners, directly or through the yacht clubs or the Harbormaster's Office, would alert boaters to the times they should expect to encounter ferries near the marina and harbor entrance. Most importantly, inexperienced boaters need training and practice, available in boating classes provided by most yachting clubs, in dealing with the commercial traffic that exists in San Francisco Bay, if they are to

reduce or avoid accidents in the future.[54] As noted in Variants to the Proposed Project, Ferry Service Variant, BCDC would review any proposal to operate ferries in the vicinity of the new ballpark.

Vessel Safety

Comment

Vessel safety...needs to be enforced by strict regulation of the ferries' movement. This could be accomplished by a traffic controller at the west end of the ballpark facility, over existing VHF radio frequencies which could be monitored by the harbormaster and boaters. A similar system (on a much larger scale) has been used in the Bay for many years. (Doug Gooding, CAC member)

Response

The system referred to in the comment is the Vessel Traffic Service, operated by the Coast Guard to track all water traffic in San Francisco Bay. This system already is in general use by licenced commercial traffic, including the ferry services, although it may be unfamiliar to, or ignored by, casual boaters. Educating casual boaters to the system's capabilities, and refreshing the commercial mariners recognition of smaller craft on the Bay, would allow the various types of watercraft uses to co-exist in a responsible fashion.[55]

Comment

Lastly, both EIR volumes provide scattered reference to direct ferry services to the proposed ballpark. Two boats are mentioned docking at either a wharf or float. (VI-VII 1,6) (VI-250) Some mention is made of BCDC and RWQCB#2 approvals, little mention is made of involvement by the U.S. Corp of Engineers, Fish and Game, and Coast Guard, although the need for dredging was considered and dismissed. I believe that the ferry option should be explored more thoroughly. (Silva B. Creg)

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54. Carter Strock, Harbormaster, South Beach Harbor, telephone conversation with EIP Associates, May 9, 1997.

55. Commander Robert Lorrigan, Coast Guard Marine Safety Officer, telephone conversation with EIP Associates, May 9, 1997.

Response

As noted in the second response in Ferry Service Variant, BCDC would review any application to construct a ferry landing and operate a ferry service. Such an application also would be reviewed by the Corps of Engineers in a separate procedure and by the Regional Water Quality Control Board. As stated on p. II.30 of the EIR, BCDC has authority over new fill (including piles and breakwaters) that would be needed for the ferry terminal. Similarly, the RWQCB regulates surface water quality and activity which could affect that quality (see p. III.165 - III.166 of the EIR) through required SWPPP's and NPDES permits. The Corps' authority over mooring buoys/or piers (the ferry landing) and fill (guidepiles, breakwater) would require review under Section 10 of the River and Harbor Act of 1899 and Section 404 of the Clean Water Act. All the above listed actions are separate from, and in addition to, the CEQA requirement for environmental review.

Comment

[T]he impacts on aquatic and bird life including, but not limited to, the impact on Pacific herring spawning must be addressed with reference to the building of a Ferry Terminal as proposed in the Ferry Service Variant (pp.V.II1-VII.9). (Leslie S. Caplan, San Francisco BayKeeper Waterfront Initiative)

Response

The potential impacts of the proposed ballpark construction on aquatic ecology are discussed extensively on pp. IV.306 - IV.320 of the EIR. Pile driving, turbidity, tug and barge movement, sediment control, spill control, and resuspension of submarine contaminants are covered in that discussion, and mitigation measures are listed on pp. V.66 - V.71 of the EIR. The discussion and mitigation also apply to the construction of a ferry landing, although at a somewhat smaller scale, as noted on p. VII.7 in the analysis of the Ferry Variant. No repetition of that text appears necessary.

Comment

Ferry Dock: The Draft EIR provides no information explaining why the ferry dock is as large as proposed (30 feet wide by 360 feet long). The final EIR should provide information on the uses that would occur on the ferry dock. For example, would passenger queuing

occur on the dock or along the shoreline promenade? If queuing would occur on the promenade, should a larger plaza be provided to minimize potential conflicts between waiting ferry passengers and pedestrians walking along the promenade? What, if any, facilities (such as ticket booths, benches) would occur on the dock? Could these uses be accommodated along the shoreline? The final EIR should also analyze whether a smaller ferry dock could accommodate the proposed ferry.

Breakwater: While the design and locations of the two proposed breakwaters appear to minimize impacts on Bay resources, the final EIR should provide more details about the dimensions and plan details of the proposed breakwaters so that the Commission can determine whether the breakwaters have in fact been designed to minimize impacts to the Bay. (Robert J. Batha, San Francisco Bay Conservation and Development Commission)

Response

As shown in Figure VII.A.1 on p.VII.2 of the EIR, the ferry landing is intended to accommodate two vessels, each of which needs a turning radius in excess of 200 ft. (circles shown in the Channel). For the vessels to operate effectively, adequate separation must be provided. Hence the length of the landing shown in the figure. The width of the landing would provide queuing space for passengers so that queues would not extend onto the promenade. This configuration is based on the conceptual analysis prepared by Moffatt & Nichol Engineers, for a two-berth ferry facility parallel to the Pier 46B bulkhead. A smaller, two-sided landing was considered, and could be designed perpendicular to the bulkhead. It would extend farther into the Channel, and passenger queues would not be able to be accommodated completely on the landing. No final design decisions have been made with respect to the size of the landing, its orientation, the size of the adjacent plaza, or the location of passenger queues and ticket sales facilities, benches or other amenities that could be included in the ferry landing. These options will continue to be explored with operators and representatives of potential funding sources.

The design and location of the optional breakwater system is based on the conceptual analysis prepared by Moffatt & Nichol Engineers for the ferry service berthing facility. As stated on pp. VII.4 - VII.5 of the EIR, the analysis indicated that at least one of the breakwaters would be needed to reduce wave action during the 50-year wave event, and would add to the comfort and safety of passengers during less severe wave events. If the ferry service is to be

used only during the baseball season, this level of protection would not be needed (extreme wave events are most commonly associated with winter storms), and the breakwaters probably would not be constructed. Ferries would be diverted to the Ferry Building Terminal if wave conditions prevented berthing at the ballpark, and a shuttle service would be provided for passengers. As stated on p. VII.8 of the EIR, the conceptual design of the breakwater system would allow circulation of water currents and floating marine organisms, while preventing sedimentation, and providing anchorage surfaces for sessile marine organisms. The dimensions of the proposed breakwaters are conceptual, but are intended to comply with BCDC regulations and to have minimal impacts on Bay resources. If the ferry service is to be used year-round, and a breakwater is needed, it will be designed in compliance with BCDC requirements.

Comment

Page II.23: What is the status of efforts to secure financing for a ferry berth? Will the Giants finance it if public agencies do not? (Steven L. Vettel, Residential Properties Group)

Response

The project sponsor is working with its consultants and with potential operators to prepare a financing plan, based on the concept-level plan for locating a ferry berthing facility between the eastern end of Pier 46B and the Third Street Bridge. The financing plan will examine the feasibility of constructing the ferry terminal through some combination of public funds and ferry operator contributions. The project sponsor has committed to finance the ballpark privately, but not transportation and infrastructure improvements, such as the ferry berthing facility.

No Dedicated Parking Variant

Comments

I think the non-dedicated variant for parking in the DEIR should be adopted, and this will, we hope, eliminate most of the parking problems because more fans would then take whatever transit is available. (Mariuccia Iaconi, PLAN on Potrero Hill)

We favor the "No Dedicated Parking Variant", on page VII.9, to the project to reduce traffic demand and resultant adverse traffic impact to the State highway system. Additional transit service needs to be included with this variant. (Harry Y. Yahata, Department of Transportation, Caltrans)

Page VII.9: This variant must be given more serious scrutiny. With the demolition of the Terminal Separator structure and the Embarcadero Freeway, the South of Market streets have become the major traffic throughways for the entire downtown area. The severe congestion predicted in this report will not just impact the neighbors in South Beach or the marine businesses south of the Channel, but businesses throughout the City. Restaurants and retailers who depend on delivery of goods, service providers who have appointments downtown, tourists coming from the airport, will all be effected by the delays predicted in this report. The only way to reduce the impact is to reduce the number of cars coming into the area. The best way to do that is to make this a truly transit-first project. (San Francisco Tomorrow Waterfront Committee)

We enthusiastically support the "No Dedicated Parking" variant, under which the project sponsor would not provide 5,000 dedicated parking spaces. Parking is a strong incentive for driving, while lack of parking motivates people to pursue other transportation options. In support of our view, the DEIR finds that transit demand would be substantially greater under this variant and that automobile occupancy would increase by as much as 40 percent. The DEIR also finds that, under this variant, impacts to air quality and traffic would be insignificant because of the reduction in vehicle trips to the site. The advantages of this variant are so compelling that we urge the City to require it as condition of project approval. Parking spillover onto residential neighborhoods would be minimal because of the walking distances involved, and any that occurs could be handled by expanding residential parking districts. (Ellen Garvey, Air Pollution Control Officer, Bay Area Air Quality Management District)

Eliminate the 5,000 car parking lot: No amount of mitigation expressed in this DEIR comes close to the Denver standard for zero tolerance for negative effects to surrounding neighborhoods. The project lacks an access and circulation network that gives priority to transit, encourages pedestrians and accommodates the needs of area residents and businesses with minimal disruption to adjacent neighborhoods. The only apparent means to this end is to eliminate the 5,000 car parking lot. This is Variant B in the DEIR. The LOS deterioration predicted with the 5,000 car parking will be a disaster for the Giants and the Neighborhoods regardless of the proposed mitigation. (For example, Third Street is closed to all but ballpark uses before and after games depriving Hunter's Point-Bayview of its direct access. In addition, converting Terry Francois Blvd. into a four-lane arterial will disrupt, if not curtail, uses of the Port's new ramp and the boat clubs on that street). The presence of the 5000 parking spaces does not forward the City's Transit First Policy and rather encourages the disruption of the adjacent neighborhoods: South Beach, Mission Bay (including Mission Creek), and Potrero Hill. (Philip De Andrade, delegate of Mission Creek Harbor Association)

Eliminate the 5,000 car parking lot: No mitigation expressed in this DEIR comes close to the Denver standard for zero tolerance for negative effects to surrounding neighborhoods. The project lacks an access and circulation network that gives priority to transit, encourages pedestrians, and accommodates the needs of area residents and businesses, with minimal disruption to adjacent neighborhoods. The only apparent means to this end is to eliminate the 5,000 car parking lot. This is Variant B in the DEIR. Franchises would need to be given to private shuttle service to remote parking. The LOS deterioration predicted with the 5,000 car parking will be a disaster for the Giants and the Neighborhoods, regardless of proposed mitigations. (Philip DeAndrade, Mission Creek Harbor Association)

I also would recommend that this Planning Commission and Redevelopment Commission recommend the no parking variant to the Board of Supervisors. Let those fans bite the bullet now. Let them figure out that there is no parking in San Francisco. San Francisco is transit first. We have a transit first policy. The EIR brushed aside the parking difficulties in South Beach. Well, let them bite the bullet. Let them take the train. Let them take the ferries. Set that parking lot up for charter bus service and HOV eight-passenger vehicles only. Forget about letting people drive into the city. You establish it right up front, right now. Maybe we can get the message to the fans to take public transportation. (Jeffrey Leibovitz)

Response

The comments support the No Dedicated Parking Variant, described on pp. VII.9 - VII.16 of the EIR. The Planning Commission and the San Francisco Redevelopment Agency Commission are the decisionmakers who will develop the conditions of approval for the project. Development of the conditions of approval will be based on the mitigation measures, variants, and/or alternatives described in the EIR, including the No Dedicated Parking Variant.

As discussed in the EIR, the parking deficiency created by the No Dedicated Parking Variant would increase transit demand. There could be considerable additional demand for transit service, but MUNI does not presently have plans to provide the additional service needed to accommodate the increased demand (see p. VII.13 of the EIR). The EIR, pp. VII.13 - VII.14, notes that sources of funding would need to be identified if this Variant were selected. The EIR also notes that charter bus use could increase, and that the project sponsor could lease off-site parking for charter buses at some location in the southeast area of the City, if such space were available. If the decision-making agencies select this Variant, they could impose those two conditions upon the project, by requiring the project sponsor to

contribute funding to MUNI to accommodate increased transit demand and to lease off-site parking for charter buses, or this could be provided by the City. It is worth noting that Coors Field in Denver has about 7,000 parking spaces available. See Land Use, Land Use Impacts on South Beach Park and South Beach Harbor and Land Use, Land Use Impacts on South of Channel Uses, for discussion of effects to the project vicinity; and see Transportation and Circulation, Parking, *Residential Permit Parking Program* for discussion of residential parking permits and Parking, *Satellite Parking* for discussion on impacts on Terry A. Francois Boulevard.

Comment

Page VII.11: The parking shortfalls associated with the no dedicated parking variant should be considered a significant environmental impact. The ongoing operation of the ballpark should be conditioned on a permanent dedicated parking solution being in place by the time the surface parking is no longer available. (Steven L. Vettel, Residential Properties Group)

Response

As discussed in the EIR on pp. VII.11 - VII.12, under this variant, a parking deficiency of 7,600 spaces would occur for weekday afternoon ballgames in year 2015; up to 3,600 spaces for weekday night games; and up to 5,000 spaces for weekend games, assuming a sellout crowd. Parking deficiencies are not considered a significant impact (see p. IV.214 of the EIR). As is noted in Alternatives to the Proposed Project, historically, San Francisco has restricted parking Downtown with the result that the lack of parking has reduced the use of single-occupant vehicles. For information regarding permanent dedicated parking, see the discussion under Project Description, South of Channel Parking.

Increased Dedicated Parking Variant

Comments

[W]e urge the City to not approve the "Increased Dedicated Parking" variant, which would include an additional 1,800 parking spaces. We concur with the DEIR's assessment that this variant would result in increased air pollution, worsened traffic conditions and greater noise levels. If these parking spaces are provided, they will be occupied by fans who otherwise

would have used another transportation mode--most likely transit--to reach the ballpark. This variant is clearly inconsistent with San Francisco's "transit-first" policy, as acknowledged in the DEIR. (Ellen Garvey, Air Pollution Control Officer, Bay Area Air Quality Management District)

All of these comments also apply to Section VII - Variants to Proposed Project / Increased Dedicated Parking Variant. (Jeffrey Brown)

Response

As discussed in Variants to the Proposed Project, No Dedicated Parking Variant, the decision-making agencies must consider all alternatives and variants to the project. The Increased Dedicated Parking Variant may or may not be required to be implemented as part of the project if the project were to be approved.

Comments

VII.17, Increase[d] Dedicated Parking Variant: This is a key project variant, but assumes parking at the wrong location. The alternative should look at parking provided south of the project- either at existing 3COM Park lots or in the industrial areas off Army St exits with a bus shuttle to the new ballpark. This variation would then show if there is a potential to reduce the impacts by relocating parking. (Diane Nygaard)

If dedicated ballpark parking must be provided, it is inappropriate to site it on the waterfront (and definitely not on Pier 50, as one variant suggests). The EIR should investigate parking to be provided further south of the project - either at existing 3Com Park lots or in the industrial areas off Cesar Chavez (Army) Street, with bus shuttles to the ballpark. A shuttle bus dropoff and pickup point in the area of the proposed parking lot, with access via an improved Illinois Street, would allow existing maritime uses to survive. Public transit improvements, particularly south and west of China Basin Channel, linking to neighborhoods other than downtown, should also be included. (Comment from petition attached to letter by John H. Super, Commodore, Bay View Boat Club, and to letter by Betty A. Boatright)

If dedicated surface parking MUST be provided (and many of us think it's a mistake), an alternative site with less active maritime uses and less immediate development plans should be considered. If Catellus still owns the significant amount of former railyard property off 3rd Street between 25th and 26th Streets (Assessors Blocks 4297, 4298, 4299, 4300, 4301, 4302 and 4303), that site, with 280 and 101 access via Cesar Chavez (Army) Street, could be used for dedicated ballpark parking... Any dedicated parking site should be studied and improved (at project owner or parking lot operator expense) for...public transit improvements and shuttle transportation. (Corinne W. Woods, Secretary, Bay View Boat Club)

Response

The commentors request that the EIR analyze parking in alternative locations. The No Dedicated Parking Variant and Increased Dedicated Parking Variant are presented to test the propositions that auto parking encourages auto use and thus increases traffic in the area or that auto parking satisfies the demand for parking and reduces traffic in the area. In this way the merits of more parking and less parking can be evaluated. The Increased Dedicated Parking Variant analysis presents a conservative approach by assuming a parking area envelope that includes additional parking located on Port property including Pier 50. As has been noted in Section A, Introduction, subsequent to the publication of the Draft EIR, the Port has decided to locate the Maintenance Operations Facilities on Pier 50, precluding the use of the pier for ballpark parking. See Project Description, South of Channel Parking, for discussion about the project parking; see Transportation and Circulation, Parking, *Satellite Parking*, for discussion of satellite parking at 3Com Park.

ALTERNATIVES TO THE PROPOSED PROJECT

Comments

It is hard to imagine that two alternatives, one of which is statutorily required, present a "reasonable range", as required under *CEQA Guidelines* 15126(d). The Courts have upheld only one instance of an EIR that discussed only two alternatives as a "reasonable range". In this sole case, the "project" was a moratorium on water hookups, which essentially maintained the status quo. The Court questioned the need for an EIR in the first place (see *Marin Municipal Water District v. KG Land Corporation*, 235 Cal.App.3d 1652).

CEQA Guidelines 15126(d)(4) requires that if the environmentally superior alternative is the "no project" alternative, the EIR shall identify an environmentally superior alternative among the other alternatives. Because the DEIR analyzes only two alternatives, selection of the "Reduced Project" alternative as the "environmentally superior alternative" is a pro forma exercise.

The California Supreme Court has stated that lead agencies and not project commentors have the burden to formulate alternatives *(Laurel Heights Improvement Association v. Regents of the University of California*, 47 Cal.3d 376, 406).

An EIR should focus on alternatives capable of "substantially lessening" significant environmental effects (*CEQA Statutes* §21002, *CEQA Guidelines* §15126), "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (*CEQA Guidelines* §15126(d)(1)). "The EIR should briefly describe the rationale for selecting the alternatives to be discussed" (*CEQA Guidelines* §15126(d)(2)). While the "No Project" alternative is statutorily required, it is unclear why the "Reduced Project Alternative" has been selected, and what significant environmental effects would be reduced.

The DEIR has already indicated the "reasons for rejection" for both alternatives considered. It was under the assumption that the *decision-makers* choose or disregarded the alternatives. It seems the DEIR has considered the selection of the project as a fait accompli, which violates the purpose of the DEIR as an unbiased information document.

The *CEQA Guidelines* in a 1994 revision states that "[t]he "no project" analysis shall discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services" (*CEQA Guidelines* §15126(d)(4)). That follows from the OPR's 1990 "General Plan Guidelines" and *Environmental Planning and Information Council v. County of El Dorado* (131 Cal.App.3d 354). The DEIR does not include such a project alternative. This alternative should describe maximum buildout of the project area, including buildout of the areas proposed for parking. (Scott MacPherson)

It is my opinion that the site selected for the ballpark is not feasible without further study to include the possibility of either moving the South Beach Harbor facility or the Pacific Bell Ballpark to a more feasible location. The city has an existing commitment to their 700+ boat owner tenants at South Beach Harbor and this fact can not be overlooked in this Draft Environmental Impact Report. (Mark Miner)

Response

Alternatives are formulated to provide decision-makers with a range of project options to lessen the significant impacts of an identified project. Alternatives were selected that would address the probable significant effects while taking into consideration the requirement of Proposition B that the City actively pursue development of a ballpark at the site. These issues include: the location of the project and the transportation, circulation and air quality effects. The location of the project has been the subject of an ongoing dialogue in the City for many years, as described below. The other effects primarily relate to the project's characteristics as a special event center. The City decided these issues could be addressed in four ways: with an additional transit option (Ferry Service); with additional parking provided; with no parking provided; and with a reduced project design. Alternative locations that have been considered are also discussed. The issue of possible alternative sites for the ballpark is discussed in detail in VIII. Alternatives to the Proposed Project under C. pp. VIII.21 - VIII.25 of the EIR. In brief, possible sites for a new Giants ballpark have been studied for over 30 years. Numerous sites have been studied and rejected as infeasible or, in some instances, rejected by voters in ballot initiatives. Consideration has been given to sites at locations throughout San Francisco as well as moving the team out of state to Florida.

Most recently, beginning in 1993, three downtown sites were considered: Seventh and Townsend Street; Rincon Hill and the China Basin site. For a variety of reasons, as enumerated in the EIR, the China Basin site was considered the superior of the three alternatives. This site was submitted for consideration by the voters as Proposition B in March 1996. In approving the proposition the voters have directed the City to utilize the China Basin site for a ballpark. CEQA Guidelines Section 15126(d)(5) states that the "rule of reason" governs the range of alternatives analyzed in the EIR. The voters approved

construction of a ballpark located on this site. Because the objective is to build a ballpark on this site, the range of alternatives examined is quite limited--each alternative must include a ballpark project. CEQA Guidelines Section 15126(d)(2) requires the examination of alternatives to include those that could feasibly accomplish "most of the basic purposes of the project."

As discussed in the EIR, other sites were not examined for several reasons, see EIR p. VIII.21 - VIII.25. CEQA Guidelines Section 15126(d)(5)(B)(2) allows the lead agency to conclude that no feasible alternative locations exist, and include the reasons in the EIR. This EIR provides those reasons, after staff for the lead agency worked on an initial study and determined the appropriate scope of the EIR's analysis.

Moving the South Beach Harbor facilities, as suggested by the commentor, is not within the control of the project sponsor. South Beach Harbor is under the jurisdiction of the SFRA. Should such a proposal be considered by the SFRA, it would be subject to separate environmental review.

The transportation, circulation and air quality impacts of the project are addressed in two ways, by variants and by alternatives. The variants specifically address the traffic and circulation impacts of the project. The Ferry Variant is discussed both as a mitigation measure and as a variant. The discussion in both places ensures that decision-makers and the project sponsor each have an opportunity to consider its merit. The parking variants are presented to test the propositions that auto parking encourages auto use and thus increases traffic in the area or that auto parking satisfies the demand for parking and reduces traffic in the area. In this way the merits of more parking and less parking can be evaluated. Historically, San Francisco has restricted parking Downtown: the lack of parking has reduced the use of single-occupant vehicles. The ballpark project currently proposes to provide 5,000 interim dedicated parking spaces. See the discussion under Project Description, South of Channel Parking.

Responsive to Proposition B, the Reduced Project Alternative evaluates a ballpark with only those ancillary commercial activities that would be needed to serve baseball. The analysis of alternatives, as the commentor notes, includes the selection of the Reduced Project Alternative as the environmentally superior alternative. Page VIII.26 of the EIR identifies the significant impact reduced by the selection of this alternative:

> "The Reduced Project Alternative would avoid the project's significant air quality impact of exceeding the 80 lb/day threshold of NO_x set by the BAAQMD, in both the year 2000 and year 2015."

The commentor is correct that the decision as to the "reasons," for rejection of alternatives would ultimately be made by approving agencies. On pp. VIII.12 and VIII.20, the EIR correctly indicates why each alternative would not meet "the project sponsor's goals." For clarity, the EIR has been revised as follows:

The first sentence, first full paragraph of the EIR, p. VIII.12, has been revised:

> ~~(The No Project Alternative)~~ **The project sponsor has rejected the No Project Alternative because it would not meet the project sponsor's goals to provide improved conditions for fans and players in a new ballpark facility in the City and County of San Francisco; enhance and spur economic interest in the waterfront; promote the use of local and regional transit; and provide a more convenient location for a ballpark.**

The third full paragraph, p. VIII.20, of the EIR has been revised:

> ~~(The Reduced Project Alternative~~) **The project sponsor has rejected the Reduced Project Alternative because it would not meet the project sponsor's goals to enhance and spur activity along the waterfront, and to meet as part of the project a portion of the demand for commercial facilities generated by the ballpark. The Reduced Project Alternative would also jeopardize the project sponsor's ability to privately finance the construction of the ballpark, as this alternative would eliminate the Pacific Bell Children's Learning Center and Communications Center within the Pavilion Building, which are critical to Pacific Bell's economic contribution to the construction of the ballpark.**

The discussion of the No Project Alternative, pp. VIII.2 - VIII.4, describes potential buildout of the project site without a ballpark, that might reasonably be expected to occur based on the land uses contemplated in the Port's Waterfront Land Use Plan. The CEQA Guidelines do not call for this discussion to be part of a separate alternative. The areas south of the Channel proposed for parking would be utilized on an interim basis in accordance with existing Mission Bay land use controls. Construction of the interim parking lots would not require rezoning and, as an interim use, would not preclude development of Mission Bay under current zoning. Therefore, no analysis of alternative development is necessary as part of the project alternatives. The cumulative analysis in the EIR, however, does consider both development in Mission Bay under existing zoning in accordance with ABAG projections, and a second scenario reflecting a higher level of development in the South of Channel area, until the year 2015. As stated in the EIR, on p. II.21, permanent parking is assumed to be developed by 2015 in conjunction with re-planning of the South of Channel area.

Comment

The environmentally superior Candlestick Park alternative needs to be substantially expanded. Clear side by side comparisons between the proposed new stadium and the existing stadium for all environmental impact issues needs to be included with appropriate documentation. (Joel Ventresca)

Response

The No Project Alternative involves evaluation of continuing baseball operations at 3Com Park at Candlestick Point (see pp. VIII.2 - VIII.12 of the EIR). When the No Project Alternative is the environmentally superior alternative, CEQA requires that another alternative be so identified. The environmentally superior alternative is the Reduced Project Alternative, as discussed in the EIR, p. VIII.26.

INITIAL STUDY

Population and Employment

Comment

According to the Construction Industry Research Board, for every million dollars spent on non-building/commercial construction, 62 new heavy construction jobs within the Bay Area will be needed to accommodate the project over the 29 month period of building. (Sue Markland Day, Executive Director, California Alliance for Jobs)

Response

As indicated by the commentor, the proposed project would generate construction jobs for Bay Area workers. In order to provide an estimate of employment generation during the construction phase, the project construction contractor was asked for estimates of the number of full-time construction workers. As reported in the Initial Study on p. A.17 of the EIR, the construction phase would employ about 800 full-time workers. The type of worker was not specified so that there is no basis to compare this estimate to that derived using the Construction Industry Research Board's rule of thumb. Nevertheless, the point made by the commentor and underscored by the Initial Study is that the project would create the need for a substantial workforce during the construction period.

Comment

The potential impact of the proposed project on "Population" (as defined by CEQA could be significant. Mitigations should be imposed to eliminate the potential impact.

The Initial Study and Draft EIR rely upon continued employment of current 3Com Park employees as a basis for conclusions on the potential impacts of the proposed development. There are repeated representations made throughout both the Initial Study and the Draft EIR that some number (variously described as "a majority," "at least some," "most," "predominantly") of the 1,400 operations jobs created as a result of construction of the proposed stadium complex will be filled by individuals who make up the current 3Com Park workforce. The placement and frequency of these statements, particularly in section B. Effects Found Not To Be Significant of the Initial Study, suggest that continued employment/rehire of this workforce satisfies CEQA requirements regarding impacts on "Population" and that on the basis of this representation, at least in part, potential impacts in

this area were determined to be insignificant and therefore not the subject of further environment analysis in the EIR. The relevant statements are as follows:

"Population: the proposed project does not involve the construction or demolition of any housing units. The majority of the project-specific employment would be filled by employees in similar positions at the existing 3Com Park facility." (emphasis added) Initial Study, B. Effects Found Not To Be Significant, p. A.12

The operations phase of the proposed ballpark has been estimated by the project sponsor to require up to 1,300 part-time jobs during home baseball games (83 home games are estimated for the average baseball season). These jobs would include cashiers, parking directors, parking lot clean-up, recycling personnel, guest services staff, mezzanine staff, security guards, ticket sellers, ticket takers, ushers and janitorial staff....It is also likely that at least some of these jobs would be filled by persons currently employed in the same capacity at 3Com Park at Candlestick Point." (emphasis added) Initial Study, p. A.17

"A total of about 1,800 people would work at the ballpark at a sold-out game (see Table II.E.1). Approximately 1,400 of the 1,800 employees would work only on game days during the season. Most of these jobs directly related to games would be filled by 3Com Park employees who would transfer to the new ballpark." (Emphasis added) Draft EIR--E. Project Employment p. II.25

"The employment related to the new use of the site would be filled predominantly by current baseball game-day employees at 3Com Park. The project would create new jobs in the Pavilion Building and at the centerfield restaurants." (emphasis added) Draft EIR--K. Growth Inducement p. IV.330

These statements apply quite clearly to the concessionaire and Stadium Club workforces. Table II.E.1 Ballpark Employees lists 715 of the 1,430 "Employees Directly Related to Games" as "Concessionaire Employees." (Draft EIR, II.26)

There is in fact no commitment on the part of the Giants to continue the employment of a significant portion of the current 3Com workforce at the new stadium.

The above referenced statements imply that continued employment of these workers is a *fait accompli*, a fact--that a commitment to this effect has been made by the Project Sponsor and that it is within their power to make such a commitment. In fact, in the case of the concession and Stadium Club employees who currently work at 3Com Park, quite the opposite is true. To date, the Giants have refused to commit to re-employment of the current 3Com Park concession and stadium club workforce at the new stadium. Giants' representatives have repeatedly stated to union representatives that because these workers are not their employees but rather the employees of subcontractors that they, the Giants, are not in a position to authorize or commit to their rehire. Instead they have told the union that we

must negotiate such an agreement directly with whichever concessions subcontractor(s) are chosen by them to operate in the new facility.

In February of 1996, San Francisco Giants Executive Vice President Laurence Baer stated to the Union that concession contract(s) would be signed within a year. That year has come and gone. On April 17, 1997, the date of the Draft EIR hearing, Mr. Baer informed the union that no concessionaire contract(s) have yet been signed. The Giants still refuse to guarantee rehire. There still is no subcontractor(s) with whom to negotiate a rehire agreement on behalf of the 3Com Park concessionaire and Stadium Club employees. The workers still don't have any assurances that they will keep their jobs let alone that their wages and benefits will remain the same or that their union will be recognized. There is no guarantee that rehire will occur. Continuation of employment of current 3Com Park employees at the new stadium is not a fact to be relied upon for purposes of environmental analysis.

Sufficient information is not available to support a "No Significant Impact" determination regarding "Population."

Taking the representations made regarding operations employment in the Initial Study and the Draft EIR at face value, perhaps a "majority" of the projected 1,400 game-related jobs will be filled by persons currently employed at 3Com Park. A "majority" can be as little as 50%+1. Therefore theoretically, even if all of the current concession workers--more than 500 people--lose their jobs as a result of the construction of this project, this statement would still remain "true." Or perhaps "at least some" (10?, 30?, 200?) will be able to keep their jobs. The Giants' subcontractor(s) might agree to employ the current 3Com Park workforce and they might agree to recognize the Union and they might maintain current wage and benefit levels. Or they might not. There is, at the moment, no way to know for sure. What level of displacement of a currently existing workforce by a new development is significant enough to warrant analysis and mitigation?

The correct answer to the question posed in section B.3.b. of the Environmental Evaluation Checklist contained in the Initial Study "Could the project: Displace a large number of people (involving either housing or employment)?" (Initial Study p. A.16, emphasis added) is YES. Therefore this subject warrants further environmental analysis and possible mitigation...

The majority of the current 3Com Park concession workforce are women, over 75% are people of color, a significant number live in the Southeast area of the City including Bayview Hunters Point and Visitation Valley. Many have worked at the park for 15 or more years. The jobs at 3Com Park are good jobs. Wage rates range from between $7.60-$11.30 per hour. More than 50% of the concession employees receive medical benefits for themselves and their families. These are the kind of jobs that San Francisco needs in order to maintain stable, economically viable communities--jobs that San Francisco should seek to create, not destroy when facilitating economic development.

The Project Sponsor should be required to back up their statements with solid, irrevocable commitments. A mitigation providing for continued employment/rehire of the current 3Com Park employees should be required. Measures should be taken to ensure that the jobs created by this development do not have the effect of lowering the standard of living for these workers whoever employs them at the new ballpark and that these workers will be allowed to continue to be represented by the Union if they so desire.

It would be ironic to say the least if this stadium, touted by its sponsor and supporters as a great economic benefit to the City and a source of pride for generations of San Franciscans to come, instead turned out to be the cause of economic hardship for these men and women--some of whom have worked at 3Com for more than 20 years. Without a signed commitment from the Giants to these workers--this stadium could very well become instead a shameful monument to betrayal and deceit. (Kim Jackson, Senior Research Analyst, H.E.R.E. Union Local 2)

Response

The commentor raises a concern that may be of interest to decision-makers regarding whether the part-time employees that will support the Giants operations will be new hires or rehires of current staff. The discussion of this socioeconomic issue is not, however, a matter for consideration in EIRs. Section 15131 of the CEQA Guidelines specifically indicates that social and economic impacts, such as those identified by the commentor, are not to be considered as significant effects under CEQA. The guidelines are clear in emphasizing that EIRs are to focus on the physical environmental effects of a project. Consideration of social and economic impacts may be used to define a physical environmental effect. Thus, the Environmental Checklist asks whether the proposed project would displace a substantial number of people. Such a loss of residents or employees assists in measuring the significance of the change in land use brought on by a proposed project. The social impact of the loss of jobs and the economic hardships faced by any displaced individuals are of socioeconomic concern and may be discussed in considering the merits of the proposed project; however, under CEQA, they are not considered significant environmental impacts.

The percentage of potential rehires of temporary employees at baseball games is not the basis upon which the Initial Study determines whether or not displacement of employees is substantial. Whether these jobs are held by existing employees or new employees, which is

of concern to the commentor, is not directly relevant to the environmental analysis. What is relevant is the total number of employees and to what extent that number constitutes a substantial increase (Environmental Checklist Item 3a), the effects of which would be manifest in increased traffic and demand for public services, and the total number of employees displaced (Environmental Checklist Item 3b).

With respect to Item 3a, the Initial Study, on p. A.17 of the EIR, indicates that the Giants would move their entire operation from 3Com Park to the new facilities. Because these jobs already exist, as do the concession, parking, security and janitorial jobs that relate to the operations of the ballpark during a game, the proposed Giants Ballpark would not change employment, estimated at approximately 1,300 part-time jobs. The Initial Study, on p. A.18 of the EIR, indicates that the restaurant and retail space would generate about 265 new jobs. Because most of the projected jobs already exist and the net increase in employment is modest, the Initial Study concludes that there would not be substantial population growth. Even if all employment consisted of new hires, the total number involved is very small compared to the total employment in San Francisco. Consequently, as stated on pp. IV.326 and IV.331 of the EIR, there would be no substantial change in sewer capacity requirements or demand for housing in the City.

With respect to Item 3b, construction of the ballpark would displace existing commercial/ industrial/office and some maritime-related uses in ten buildings along Berry Street. The actual loss of jobs caused by demolition is estimated at about 170 commercial/industrial jobs, about 90 office jobs, and about 40 maritime-related jobs. The Initial Study explains on p. A.18 of the EIR that the existing operations can be relocated successfully within areas of similar land use in the city. Because these businesses can be relocated and because the total loss of employment is nearly offset by the new jobs created by the proposed project, the Initial Study concludes that there would not be substantial displacement of people.

Cultural Resources (Historic Structures)

Comment

Each one of the Eight Priority Policies has direct relevance to the Ballpark project, and must be addressed by the Giants, the city, or both. Actions or project components which we feel would contribute to a "Priority Policy Conforming Project" that is responsive to each of the Eight Priority Policies include:...

- "That landmarks and historic buildings be preserved..."

...Maintaining neighborhood quality and livability also encourages the preservation and restoration of historic buildings in the area. The DEIR must include an alternative that incorporates the foregoing goals and associated mitigation measures that implement these goals. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Response

Mitigation measures or project alternatives to protect landmarks and historic buildings certainly are warranted when a proposed project has the potential to affect such cultural resources significantly. To determine the potential for such cultural resources on the project site, literature and records searches were performed during preparation of the Initial Study. The lists and reference documents consulted included the National Register of Historic Places, the San Francisco Department of City Planning 1976 Architectural Survey, and a 1990 update to a 1983 Historic Property Survey Report. None of the buildings on the project site that would be affected were listed or considered eligible for listing (see below). Consequently, there are no landmarks or buildings that warrant preservation for cultural significance, and neither mitigation measures nor project alternatives are necessary to address this issue.

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The actual ballpark site was covered by coal gas plants and wharves in historic times. However, the whaler Lydia was discovered in King Street in 1980 within a block of the project area during the San Francisco Wastewater Management's cultural resources program (see attachment). The possibility of locating other buried ships cannot be ruled out.

If proposed construction activities, or plans to provide parking on either side of 3rd Street change to impact the area along Third between King and Berry streets, or the south frontage of Berry Street between Third and Fourth, these areas appear to have high historic archaeological potential based on a cursory inspection of the 1887 Sanborn Insurance Company's maps. The area includes saloons, stores, house, hotels, restaurants, a sail maker's and a ship's chandlers business (see attachments). Deposits associated with these structures would be of high interest to archaeologists attempting to understand the early days of San Francisco. These areas would need to be assessed in advance to meet Section 106 requirements. (Jack McIlroy, Staff Historical Archaeologist, Anthropological Studies Center)

Response

The potential for project construction to disturb significant historic deposits, as described by the commentor, is acknowledged in the Initial Study on p. A.45 of the EIR. In recognition of this potentially significant impact, the Initial Study recommends conducting a pre-excavation testing program to determine the probability of finding cultural and historical remains (see Archaeological Resources, below). If, after such testing by a qualified archaeologist, it is determined that further investigations or precautions are necessary, the archaeologist will consult with the City's Environmental Review Officer to determine appropriate procedures. This pre-excavation testing program is consistent with the recommendations of the commentor to assess the significance of areas believed to be of high historic archaeological sensitivity.

Comment

The [Landmarks Preservation Advisory] Board... pointed out that the local historic district is eligible for the National Register of Historic Places and that specific buildings within the District, especially on the north side of King Street, are individually eligible or listed on the National Register of Historic Places. In addition the Board recommended that the DEIR include a map identifying the historic resources on and in the vicinity of the Project Site including but not limited to the South End Historic District, the Francis "Lefty" O'Doul/Third Street Bridge, City Landmark No. 194, and structures like the Peter Maloney Bridge at Fourth Street, which are listed in the State Historic Resource Inventory as either eligible or on the National Register of Historic Places. (Denise M. LaPointe, President, Landmarks Preservation Advisory Board)

Response

The Initial Study, on p. A.42 of the EIR identifies the presence of several properties in the vicinity of the project site that are historically significant. Eight properties, in particular, are within one block of the project site, according to the Mission Bay Final EIR (1990). The Initial Study indicates that none of the nearby structures would be discernibly affected by the construction of the ballpark.

The Initial Study recognizes the local significance of the South End Historic District on pp. A.42 - A.44 of the EIR, and the comment regarding the District's eligibility for listing on the National Register of Historic Places is noted in this response. If potentially significant impacts to architectural resources either within or outside the South End Historic District were anticipated, a map of the District and the adjacent properties would be helpful. However, in the absence of any significant effects, such a map was not prepared. The presence and location of the South End Historic District is noted on p. III.39 of the EIR.

Comment

Vol. II, Page A.43, second paragraph first sentence. This is a fragmented sentence, which does not make sense as written. Review and correct. (Rincon Point South Beach CAC)

Response

The first sentence of the second paragraph on p. A.43 of the Appendix to the EIR is incomplete. The complete sentence reads as follows.

> **A 1990 update to a 1983 Historic Property Survey Report completed for the City's Embarcadero Surface Roadway Project concluded that many buildings along Berry and King streets between Second and Third streets <u>have architectural merit representing the earlier industrial character of the area</u> (including the buildings at 40, 50, and 70 Berry Street that have a Department of City Planning 1976 Architectural Survey rating of "3").[4]**

Archeological Resources (Pre-Excavation Survey)

Comments

With regard to the proposal for an archaeologist to monitor ongoing construction work (V.72) following a pre-excavation testing program, our experience has been that this simply annoys all parties concerned, if there are late discoveries. The contractor is upset because construction has been halted, the client may be required to pay downtime fees, and the archaeologists, who by now are disliked by everyone for holding up the project, rarely have sufficient time to complete their studies as they would wish. Four weeks suspension of construction activities is unlikely to be sufficient time to deal with a buried ship. It is far more efficient, when possible, to complete the archaeological work in advance of construction. (Jack McIlroy, Staff Historical Archaeologist, Anthropological Studies Center)

Let's see, where am I here. I hope an adherence to the archeological factors [is] respected. (Ben Lubbon)

Response

The commentor correctly notes that the most effective approach is to complete the archaeological work prior to beginning construction. In urban areas, such as the China Basin Channel area where buildings already exist, the pre-excavation testing program must follow the demolition of those buildings. Subsurface testing of selected sites then can be completed in advance of construction. As stated in the mitigation measure on p. V.74 of the EIR, the remains of ships or boats could be buried almost anywhere on the site. The areas judged most likely, by the archaeologist, to contain cultural resources would be tested during the pre-excavation testing program (see p. V.72). It would not be feasible for the archaeologist to test 100 percent of the site, but if, after testing, the archeologist determines that further precautions are necessary, the archaeologist and the Environmental Review Officer would determine necessary additional procedures, such as a monitoring program (see p. V.72 of the EIR).

The City agrees with the commentor's recommendation to perform archaeological investigations in advance of construction. It is precisely for the reasons cited by the commentor that the Initial Study (see p. A.50 of the EIR) calls for a pre-excavation testing program. The purpose of this program would be engage the services of a qualified

archaeologist to conduct a program of testing, including borings, trenches, and other techniques, to determine the probability of finding cultural and historical remains *before* construction and ground disturbance.

With regard to the length of time work would need be suspended to accommodate evaluation of cultural resources, a four-week period is standard for San Francisco, based on previous experience and the recommendation of urban archaeologists. It is inappropriate to prejudge the exact amount of time needed to deal with a buried ship, without any information about location, condition or even existence of such a resource. That determination would be made jointly by the archaeologist and the Environmental Review Officer, in the event a buried ship were located that could be damaged by construction activity.

The City fully intends to require the project sponsor to adhere to the requirements identified n the Initial Study and the EIR regarding the identification and preservation of significant rchaeological resources. The City will ensure that these mitigation measures are mplemented through the Mitigation Monitoring and Reporting Program, required of every roject for which potentially significant effects have been identified and mitigation measures ave been approved to minimize these effects. This program, implemented in response to ublic Resources Code 21081.6, requires agencies approving a project to verify that the itigation measures are implemented. The proposed mitigation for the Giants Ballpark to erform archaeological testing (see p. A.50 of the Initial Study) have been included in the litigation Monitoring and Reporting Program for the project (see V.72 - V.74 of the EIR).

nergy Consumption

omment

I recent years, it has become an acknowledged fact that new construction operations nsume great amounts of non-renewable energy resources. Much heat is used in the rication of steel and concrete. Additional energy is spent moving and fashioning terials. This E.I.R., as some others have done before, should provide an accounting of t amount of energy and non-renewable resources which will be consumed in the

construction of the proposed project. As a frame of reference, it is known how much energy is used each year for the operation of Candlestick Park - field lights, elevators, escalators, parking lighting, heat, etc.

The equivalent energy, expressed in hundreds of years of stadium operation, should be determined. If Candlestick should be torn down after the Giants occupy the proposed stadium, an equivalent amount of this energy may be considered to be likewise consumed by virtue of its destruction. (Joel Ventresca)

Response

Energy would be consumed for a variety of different functions, related to the construction of the proposed project, that would constitute a one-time energy expenditure. As noted in the comment, energy would be consumed by equipment needed to haul construction materials and waste, to excavate soil, to process construction materials, and to transport off-site materials and equipment. The California Environmental Quality Act (CEQA) evaluates the environmental impact of projects on the basis of whether large amounts of fuel or energy are used in a wasteful fashion, and whether the project would have a substantial effect on the potential use, extraction, or depletion of a natural resource (see Initial Study checklist on p. A.38 of the EIR). Construction of the ballpark would not use energy in a wasteful manner because construction activities are related to economic production, energy expenditures are necessary during construction, and modern equipment and engines use fuel relatively efficiently.

Additionally, pp. A.38 - A.39 of the EIR discuss the changes in energy use that can be expected during operation of the proposed ballpark, in comparison with 3Com Park. In summary, energy consumption at the new ballpark would be approximately the same as that of 3Com Park during the baseball season. Information on the expected increase in energy use is provided on p. A.39 of the EIR. Small increases in consumption may occur because of a planned increase in night games and expanded concession and dining facilities at the ballpark. (The proposal for a restaurant has been withdrawn: see Response Project Description, General, fifth response for further discussion of restaurant uses). The small increases in energy consumption may be offset to some extent by energy-efficient electrical

designs, modern insulation for gas-heated areas, and adherence to the latest construction standards of the City. Therefore, the proposed ballpark at China Basin would not use substantially more energy than currently used at 3Com Park. Consequently, it is not expected that construction or operation of the proposed ballpark would use energy wastefully, nor would unreasonable demands be placed on the City's electrical and gas supply. Potential demolition of 3Com Park, and the energy used in its demolition, would be addressed during separate environmental review of the *Bayview-Hunters Point Redevelopment Plan*, which includes the proposed 49ers stadium as a variant of the proposed plan.

Water Supply (Water Purveyor Information)

Comment

According to Public Resources Code §21151.9, certain projects are required to seek out long-term water planning information from water purveyors, and to include the information in the EIR. This includes a proposed shopping center or business establishment over 500,000 square feet of floor space. No such information seems to be included in the EIR. (Scott MacPherson)

Response

Public Resources Code Section 21151.9 states that any projects requiring EIRs must comply with Part 2.10 of Division 6 of the Water Code. In summary, Water Code Division 6, Part 2.10 (Section 10910) requires that a city or county preparing an EIR for certain development projects must request information about the availability of water to serve the project from the local water system that would supply water to the project. Section 10913 of the Water Code provides a definition of "project" for purposes of this Part; that definition does not include recreational facilities, sports facilities or any other kind of development project that is similar to the proposed Giants Ballpark at China Basin. In any case, the ballpark would be a relocation of an existing use, and would not impose a new demand for water supply on the San Francisco Water Department.

The non-ballpark portion of the proposed project would not be a size or scale that would fit within any of the definitions of "project" in this Section of the California Water Code, because the office space would be substantially under the 250,000 sq. ft. threshold established in Section 10913(c), and the retail space would be substantially under the 500,000 sq. ft. threshold established in Section 10913(b). The combination of non-ballpark uses proposed in the project, including all uses in the Pavilion Office Building and the year-round restaurant use, would be about 171,000 sq. ft., well below the state thresholds (see Table II.D.1, pp. II.11 - II.12 in the EIR for square footages of various uses). In addition, employment for these uses is expected to be 400 persons or fewer, most of whom would be existing Giants employees transferring from 3Com Park.

Although the cited sections of the Water Code do not apply, water supply issues were addressed in the Initial Study prepared for the proposed ballpark. The Initial Study indicates that the proposed Giants Ballpark would not require a major expansion of water supply facilities (see p. A.22 of Appendix A of the EIR). As discussed on p. A.26, most of the water used at the existing 3Com Park is for watering the playing field and for washing seating areas, ramps and concourses after games. Although some increase in water demand might occur at the new ballpark because of higher attendance, and consequently more extensive cleaning needs after games, water demand for the proposed ballpark is expected to be similar to that of 3Com Park. The Initial Study also indicates that any increase in water use may be offset by planned use of more water-efficient equipment, including cleaning machines that recycle water. If the Initial Study found that water demand were to increase substantially, the EIR would have included an analysis of long-term water supply issues, and water purveyors would have been contacted and consulted. Because the EIR focuses on the potential significant effects of the Giants Ballpark, and the Initial Study did not identify water supply as a significant effect, the EIR did not include an analysis of this issue.

Community Services

Emergency Services and Emergency Access

Comments

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: ...[c]ontinued...access... for emergency vehicles (fire trucks/ambulances/police). (Ship Clerks' Association, Local 34, ILWU)

Emergency vehicle operation through 68 intersections with LOS E or F is not discussed. (Philip De Andrade, delegate of Mission Creek Harbor Association)

Page IV.172, Emergency Vehicles: There is no analysis of the impacts of the ballpark on the ability of emergency vehicles to gain access to the surrounding neighborhood. This is a significant concern in the community and must be addressed. (Steven L. Vettel, Residential Properties Group)

Emergency services will be greatly compromised by the congestion. (Janet Carpinelli)

The majority of the residential is on the east side of Second Street and south of the Bay Bridge. In that triangular area alone, there is well over half a billion dollars in residential properties there which--the quality of life there needs to be addressed.

As stated before, the DEIR did not address the neighborhood quality of life issues for a residential neighborhood which we believe need to be addressed and are mandated as such under Prop. M. Items such as...emergency vehicle access for fire and ambulance service...(Richard Dickerson, South Beach Marina Apartments)

Additional traffic will interfere with emergency response plans or evacuation plans of South Beach and the immediate area. (Babette Drefke, Potrero Boosters & Merchants Association)

How will fire and other emergency services be delivered to the neighborhood when the traffic is present before and after games and other events? (Michael Karasik, Bayside Village Associates)

The Initial Study on page A.25 states that, according to the Fire Department, response times for both fire and medical emergencies are expected to improve compared to the response time at 3Com Park, and therefore the impact is not expected to be significant. This analysis is inadequate. First, this analysis should have a quantitative discussion of response times. Response times should be examined in regard to level of service standards of the SFFD. "The EIR must contain facts and analysis, not just the bare conclusions of a public agency"

(*Santiago County Water District v. County of Orange*, 118 Cal. App.3d 818, 831). Second, the analysis cannot simply compare response times to those at 3Com Park. Otherwise, the worse the existing conditions at 3Com Park, the better the project looks (see *Kings County Farm Bureau et. al. v. City of Hanford*, 221 Cal.App.3d. 692). Response times must be compared to an overall standard, which must be identified. Any project can be favorably compared to some other development -- this does not mean that either is adequate.

The EIR does not explain how emergency response times (to the ballpark, as well as responses to China Basin in general) would be affected by severe traffic congestion during games. Many arterials are expected to be degraded to LOS F. Effects to emergency response times should be considered a secondary environmental effect, and discussed in the EIR. (Scott MacPherson)

Response

The San Francisco Fire Department (SFFD) currently handles fire, medical and first aid emergencies at 3Com Park by having an engine company on stand-by at the park during ballgames. A similar arrangement is anticipated for the proposed park, with the engine company to remain on-site throughout a specified period, for example, a "ballgame window" lasting from one hour prior to the start of a game until one hour after the game is completed. Because the engine company would not be available to respond to calls outside the ballpark, SFFD would ask the project sponsor the help defray the costs of a back-up engine company to respond to the calls that normally would go to the company sent to the ballpark. Because the engine company at 3Com Park is available to accept outside calls, the project sponsor does not currently help defray the costs of a back-up engine company.[56]

Emergency SFFD calls, other than to the ballpark, would be handled by the existing system of stations, which provide initial response, additional companies, and back-up as the situation warrants. Access routes to the neighborhood in the vicinity of the proposed ballpark during the ballgame window are expected to be crowded. Traffic control and local security would be provided by the San Francisco Police Department (SFPD), as currently is done during ballgames at 3Com Park (see p. A.23 of the EIR). Access for emergency vehicles would be

56. Assistant Deputy Chief Frank Scales, San Francisco Fire Department, and Lieutenant Don Carlson, San Francisco Police Department, telephone conversation with EIP Associates, March 13, 1996 and May 9, 1997.

enhanced through the use of the OPTICOM traffic light control system already in use by the City. This system permits a dispatcher to turn all the traffic lights green in the direction of travel between the responding SFFD stations and the source of the emergency. Even with this advantage, it would be necessary for SFPD to have increased intersection traffic control units in place during the ballgame or other events at the ballpark to ensure clear passage for emergency vehicles. This procedure already is used routinely for major events involving street closures and detours as part of the traffic management plans.

SFFD and SFPD were contacted during preparation of the Initial Study for the proposed project (see Appendix A, pp. A.23 - A.25), and response times were examined. Both agencies expressed the opinion that response times would not be adversely affected because the ballgame and special events schedules would be known in advance and appropriate staffing arrangements would be made (see pp. A.23 - A.25, and p. A.28 of the EIR). SFFD and SFPD already are familiar with ballgame traffic conditions that exist along the Third Street corridor as a result of games at 3Com Park, and regularly assign calls to units situated advantageously to respond with a minimum of delay caused by traffic. During ballgames or other events at the proposed ballpark, this procedure could include having units on stand-by north and south of China Basin Channel to avoid the necessity of crossing the Third Street or Fourth Street Bridges.[57]

Comments

Each one of the Eight Priority Policies has direct relevance to the Ballpark project, and must be addressed by the Giants, the city, or both. Actions or project components which we feel would contribute to a "Priority Policy Conforming Project" that is responsive to each of the Eight Priority Policies include:..."That the city achieve the greatest possible preparedness to protect against injury and loss of life in an earthquake." We truly believe that the new ballpark will be built to the most current and highest seismic safety standards. We also believe that the Giants will prepare an appropriate emergency evacuation plan and train their staff to implement it. Of critical concern, however, is maintaining emergency vehicle access to surrounding affected neighborhoods during crush periods before and after ballpark events.

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57 Assistant Deputy Chief Frank Scales, San Francisco Fire Department, and Lieutenant Don Carlson, San Francisco Police Department, telephone conversation with EIP Associates, March 13, 1996 and May 9, 1997.

The Loma Prieta earthquake happened exactly during the pregame crush of a sold out World Series game. The DEIR must present and analyze a traffic and circulation plan that insures expeditious emergency vehicle access and movement to and from the ballpark and surrounding neighborhoods at all times. (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

Response time by emergency vehicles (fire, police and ambulance) is of concern. Existing response times are not given, nor is there comment on anticipated response time during pre and post event congested conditions, nor are contingency plans discussed. If area is gridlocked, how can emergency vehicle access be assured? An emergency vehicle access and contingency plan must be described in the DEIR.

Inclusion of an "Emergency Command / Traffic Control Center" is not discussed nor included on plans for the proposed ballpark. (Martin Fay, Rincon Point – South Beach CAC)

Response

The provision of emergency command posts already exists in the Emergency Response Plan for 3Com Park, and would be used at the proposed ballpark in much the same manner. Their provision, and functions related to them, are listed in the Emergency Evacuation Planning Measure included as part of the project (see p. V.65 of the EIR). The primary purpose of these command posts is coordinating emergency response efforts inside the ballpark. The command posts also establish and maintain contact with emergency response services outside the park, such as the Mayor's Office of Emergency Services (OES), during catastrophic events, such as the 1989 Loma Prieta earthquake. OES is responsible for city-wide emergency response coordination during catastrophic events, and stresses the need for large facilities, such as ballparks, to maintain emergency command posts staffed by trained personnel as a critical part of each facility's emergency response plan.[58]

OES also stresses the need for neighborhood coordination because the demand for emergency services following catastrophic events is very high, and aid from outside the City or state cannot be expected for about 72 hours. The Neighborhood Emergency Response Team

58. Lew Canton, Director, Mayor's Office of Emergency Services, telephone conversation with EIP Associates, May 9, 1997.

(NERT) program operated by SFFD provides training for groups of neighbors in basic disaster response skills, and teaches how to organize a neighborhood response unit that will be self-sufficient during the critical 72 hours when professional assistance may not be readily available. The NERT classes are offered without cost to the neighborhood, do not require that participants belong to a previously organized neighborhood group, and are conducted locally to promote neighborhood participation (previous classes have been held in the South Beach Marina meeting rooms).[59] The issue of a Traffic Command Center is addressed in Transportation and Circulation, Transportation Mitigation, *Transportation Mitigation General.*

Security of the Neighborhood

Comments

Regard for Public Safety and Civic Order - There is no meaningful discussion of crime/crowd control, emergency vehicle access, or incorporation of an "Events Command Center." (Rick Mariano, Chair, Rincon Point - South Beach Citizens Advisory Committee)

ecurity: The Giants must provide security in the 15-20 minute walk radius where they xpect fans to park. (Steven L. Vettel, Residential Properties Group)

am concerned that there will not be sufficient mitigation regarding...crowd control..due to ie additional pressures created by the ballpark fans and concert goers.. (Elizabeth Carney)

roject must articulate effective litter, graffiti and crowd impact mitigation measures. Michael Kriozere, Urban West Associates of San Diego)

addition to direct traffic and parking impacts, the effects of...crime (vandalism, graffiti, c.)...should be specifically addressed for the waterfront area, and appropriate mitigation easures that do not inordinately burden existing users must be included and funded in the oject plan. (Comment from petition attached to letter by John H. Super, Commodore, Bay ew Boat Club, and to letter by Betty A. Boatright)

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59 Frank Lucien, Supervisor, San Francisco Fire Department Neighborhood Emergency Response Team, telephone conversation with EIP Associates, May 12, 1997.

South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...security problems that will accompany the new ballpark. (Janet Carpinelli)

Any dedicated parking site should be studied and improved (at project owner or parking lot operator expense) for...security... (Corinne W. Woods, Secretary, Bay View Boat Club)

The construction of the ballpark will obviously present us with a number of short-term and long-term problems that need to be addressed. Among them are: ...[a]dequate night lighting [and s]ecurity. (Ship Clerks' Association, Local 34, ILWU)

Other issues of concern [to the South Beach area] includ[e] security ... [are] nowhere analyzed...[T]here is no quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel)

The majority of the residential is on the east side of Second Street and south of the Bay Bridge. In that triangular area alone, there is well over half a billion dollars in residential properties there which--the quality of life there needs to be addressed.

As stated before, the DEIR did not address the neighborhood quality of life issues for a residential neighborhood which we believe need to be addressed and are mandated as such under Prop. M. Items such as...graffiti, crime and security issues...(Richard Dickerson, South Beach Marina Apartments)

Where is the discussion of security in the neighborhoods and crowd control? The Giants make a big issue of parking availability within a 15 minute walk. Shouldn't this define the radius for the crowd control and security due to the intrusion into the neighborhood? (Michael Karasik, Bayside Village Associates)

The DEIR ignores the need for increased security created by the presence of ballpark crowds immediately adjacent to the harbor; the harbor already experiences occasional burglary and vandalism problems, which must only be exacerbated by the ballpark. Furthermore, games will spill thousands of people onto the waterfront late at night. So will the even later closings of the food service facility, as well [as] any sports bars which may be established nearby. (Doug Gooding, CAC member)

Specific "Area Plan Assumptions" the DEIR must analyze, include... A plan that provides standards to ensure that impacts caused by... fan related crime / security issues... are appropriately acknowledged and addressed by specific project sponsor and city agency commitments. (Martin Fay, Rincon Point – South Beach CAC)

...no one iota of analysis was done on the criminal justice-related impacts of an additional 2-3 million people moving in and out of the neighborhood each year. Other cities have experienced an increase in automobile thefts, break-ins, vandalism, graffiti, and the like. We

are very likely--without careful planning and the adoption of preventative measures--to experience this same crime increase in the nearby neighborhood. The DEIR should provide current and projected crime statistics for the area. (Rick Mariano)

Some of the issues are of concern to me, crime, the nature of the neighborhood in the future. I do not believe these are issues for the environmental impact. They are issues that will have to be addressed by the Police Department, by the Planning Commission, by the Redevelopment Agencies. I think that will require input from the citizens, and I think that will be provided to you. (Bill Wigert)

I think if any of you come out to the ballpark this weekend when some crowds are expected, take a look at what ballpark traffic is like. There has been some hyperbole here. I don't think any of the people who drive to the stadium are terrorizing the residents, as one of the speakers said. (Art Siegel)

[A] plan that provides standards to ensure that impacts caused by...fan-related crime or security issues...are appropriately acknowledged and addressed by the specific project sponsor and the city agencies. (Martin Fay, Rincon Point South Beach Citizens Advisory Committee)

Response

Concerns related to crowd control, vandalism, crime, and security issues in the vicinity of the proposed ballpark are addressed in the Initial Study (see pp. A.23 - A.24 of the EIR). Special Law Enforcement Services (SLES) and regular-duty services would be provided by the San Francisco Police Department (SFPD) on game days and for special events. Officers from SLES units would monitor the crowds, assist in traffic direction, and control crowd-related criminal activity inside the ballpark. Regular-duty officers would be assigned to patrol areas outside the ballpark for the same purposes. The size of the force assigned to inside and outside duty would depend on the type of event and the expected attendance. Because police coverage for special events must be scheduled in advance through SFPD's Special Events Management and Planning Unit, and because the general level of attendance at the event or ballgame would be known in advance, adequate staffing could be provided without adversely affecting the services regularly provided by SFPD to the neighborhood or the City. The coordination of SFPD services with security services provided directly by San Francisco Giants employees, the extent of the patrolled perimeter, the duration and timing of patrols, and the standards of enforcement are, for the most part, decisions made by SFPD,

based on the experiences of the local Station Commander, the Department as a whole, consultation with the event promoter, and information received from neighborhood groups and individuals. (Lieutenant Don Carlson, San Francisco Police Department, telephone conversation with EIP Associates, March 13, 1996). See Land Use, Impact of Nuisance Land Uses, for further discussion of responses to fan-related security issues in the vicinity of the ballpark, and Mitigation, Neighborhood Protection Plan.

Security of the Harbor

Comments

Security at the harbor: Boats do not have well-designed locking mechanisms, and are easily broken into. Loosely-attached, but valuable, safety equipment is on deck. (Richard Locke, Jr., South Beach Yacht Club)

Though it has been brought up at several CAC meetings and at public meetings, the DEIR has ignored the existence of the South Beach Harbor...security...problems must be studied as to the effect on this existing Maritime use of the immediate area. (Janet Carpinelli)

Not discussed is added security costs, including manpower should not be borne by the Harbor landlord or its tenants. (L. Joseph Boss)

The need for additional Harbor Security has not been addressed in any way. The added costs must be identified and must be the responsibility of the project sponsors or the City and not the harbor tenants. (Mark Miner)

The environmental impacts on South Beach Harbor warrant specific attention. Impacts on this most immediate neighbor of the new ballpark have been seriously overlooked. The marina was treated as though it weren't even there. This reflects an inadequate understanding by DEIR authors of the marina's function and role as a recreation and open space resource... The DEIR is inadequate. With respect to South Beach Harbor, it must analyze the following... Security for harbor, boats and users is not addressed... (Martin Fay, Rincon Point – South Beach CAC)

Amazingly to me, no analysis was done on the effects of the ballpark on the harbor in terms of... security,... (Rick Mariano)

Security has not been addressed at the ballpark whatsoever...If there are people inclined to get into the harbor and get into the boats, the harbor is obviously going to have to hire more security and be tighter on the security.

There are also safety items left on the decks of boats that can't be moved on and off the boats very easily, but could be easily carted off by a -- shall we say an assertive person with a cart. It could also be a safety concern. (Dick Locke)

mpact on the South Beach marina, including...security...must be considered and minimized. Abigail A. Grafton, M.A., M.F.C.C.)

Response

According to the Harbormaster, the additional security issues raised by the increased number f people in the vicinity of the Marina would pose no problems that have not already been esolved at other harbors where large crowds with diverse recreational aims share a aterfront area. South Beach Harbor could hire an additional security officer for the evening nd night shift. It is possible that closed-circuit camera surveillance could be needed where one presently exists. Owners would need to be more aware of the security needs of their oats. It would be necessary for everyone in the Marina to exercise common sense with gard to one's personal safety, and the safety and security of items stored on one's boat.[60]

Neighborhood Issues

Comment

Page VI.3, Other significant impacts: Unless mitigated, we believe the following impacts are also significant:

1. Concert noise;
2. Pile driving noise;
3. Light and glare from sports lights, scoreboard and Pacific Bell Park sign;
4. Neighborhood parking;
5. Neighborhood vehicular access;
6. Increased sewer back-ups;
7. Increased nuisance land uses;
8. Increased litter, graffiti, crime and pedestrian noise in neighborhood.

(Steven L. Vettel, Residential Properties Group)

60. Carter Strock, Harbormaster, South Beach Harbor, telephone conversation with EIP Associates, May 9, 1997.

Response

As indicated on p. VI.1 of the EIR, the final determination of significant impacts is to be made by the Planning Commission and the Redevelopment Agency. That decision would be based on the information provided in the EIR.

The EIR provides an assessment of potential significance for the impacts studied. Through the inclusion of mitigation measures, the EIR indicates that concert noise and pile driving noise impacts are considered potentially significant (see pp. V.61 - V.62 of the EIR). The concert noise mitigation measure in the EIR has been revised to limit the number of live amplified music events without limits on maximum noise levels to five per year. Additional concerts would have restrictions applied that would reduce the effects of concert noise on the neighborhood (see Noise, Concert Noise, *Impacts,* General Concert Noise, third response). The EIR also includes mitigation for pile-driving noise through scheduling pile driving times to minimize local impacts and recommending pre-drilling of pile holes. Further discussion of mitigation for pile-driving noise can be found in Noise, Construction Noise, second response.

Potential lighting impacts from the ballpark were analyzed in detail in the EIR, on pp. IV.34 - IV.45 and judged not to be significant. The analysis indicates that there would not be substantial external light generated from the project at the five representative locations studied. The analysis showed the lighting impacts to be unobtrusive, having spill light in all cases less than 1 foot-candle, and generally in the range of 0.0 to 0.2 foot-candles. In contrast, typical street lighting requirements are 1 to 3 foot-candles which is considered unobtrusive.

It was noted that ballpark lighting from Location 4, upper floors of the South Beach Marina Apartments, would be seen at its source without contrasting background lighting sources. As a result this could be found intrusive by residents at those locations. However, this effect would be localized and intermittent and thus not significant for CEQA purposes. See the responses under Visual Quality and Lighting, Lighting Effect - Exterior Signage, for further information regarding Pac Bell sign lighting and proposed design.

Parking shortages and vehicular access problems in areas surrounding the project site were identified clearly in the EIR. Chapter VI of the EIR identifies both intersection LOS and freeway ramp queuing as unmitigated significant impacts. Although the EIR does not identify these impacts separately within the immediate neighborhood as significant, the text indicates that vehicular movement and access would be restricted substantially before and after games, and lists intersections in the immediate neighborhood that would deteriorate to unacceptable levels.

Parking shortages are identified on p. IV.213 of the EIR. The EIR notes that there would be insufficient parking in the study area to accommodate demand for weekday afternoon games. The EIR also notes that parking shortfalls are not considered a significant environmental impact because they do not produce any measurable physical effects, although they are inconvenient for some drivers. This is a technical determination that parking shortfalls do not cause substantial adverse physical changes in the environment, which is the relevant criteria under CEQA. However, the EIR recognizes the inconvenience caused by such shortages and therefore includes a series of possible improvement measures on pp. IV.214 - IV.215. These measures would make better use of existing parking resources to help offset any parking deficiencies. Consideration of residential permit parking also is recommended. This is discussed further in Transportation and Circulation, Parking, *Residential Permit Parking Program.*

Sewer capacity was analyzed on pp. IV.323 - IV.325 of the EIR and also see Water Quality and Aquatic Ecology, Impacts on Capacity of Waste Water Treatment and Sewers. The analysis indicates that the project would not overburden the existing sewer system nor contribute to increased frequency of overflows.

The possibility of increased nuisance land uses is discussed in the Growth Inducement section of the EIR on pp. IV.330 - IV.334, and also in responses under Land Use, Impact of Nuisance Land Use. Although adverse impacts could occur from the introduction of

nuisance land uses, it is speculative at this time to estimate if, when, and at what scale such uses would be developed.

Crime and graffiti would be subject to police enforcement. Police services for the ballpark were discussed in the Initial Study on pp. A.23 - A.24 and Initial Study, Security of the Neighborhood. The Police Department has indicated that they have the resources to sustain the level of service currently provided at 3Com Park. Current police actions at 3Com Park average 2 to 6 citations per game and up to 12 ejections.

Litter impacts are discussed in the EIR in IV.J Water Quality and Aquatic Ecology on pp. IV.327 - IV.328, and in the following section of this document. Pedestrian noise, and noise from departing vehicles from parking areas, was discussed on p. IV.256 of the EIR. These impacts would be temporary and intermittent, thus they would not be deemed significant under CEQA.

Litter Mitigation

Page V.74:

1. Provide additional City trash receptacles on South Beach streets and Herb Caen Promenade.
2. Institute a local maintenance district, funded by the Giants or increased tax revenues and ground rent associated with the ballpark, similar to the Yerba Buena Gardens maintenance district, to provide security, litter pick-up after all events, graffiti removal, South Beach Park maintenance, and other added neighborhood maintenance requirements associated with operation of the ballpark. (Steven L. Vettel, Residential Properties Group)

I am concerned that there will not be sufficient mitigation regarding...trash...due to the additional pressures created by the ballpark fans and concert goers. (Elizabeth Carney)

South Beach: This thriving neighborhood of thousands of residents, burgeoning businesses and waterfront relaxation will be detrimentally affected by the...litter...that will accompany the new ballpark. (Janet Carpinelli)

Other issues of concern [to the South Beach area] includ[e]... neighborhood maintenance (litter, graffiti, upkeep of South Beach Park, etc.)... [are] nowhere analyzed... [T]here is no

quantification of these impacts and an analysis of necessary mitigation measures. (Steven L. Vettel, Gladstone & Vettel)

Page I.45. Litter produced during games could enter China Basin Channel...
Page I.55. The amount of litter entering the Channel from waterfront areas associated with the ballpark would be reduced by the placement of trash receptacles, regular collection of trash, public education and noticing, and regular skimming of the surface of the channel.

There is no analysis of the impact of litter on South Beach Park, and no mitigation mentioned. We suggest that cleanup of the park be a regular part of the post-game stadium cleanup, to be conducted by the Giants cleaning staff. We would also recommend placing a bounty on some types of litter, like plastic bottles or cups, to encourage recycling. (San Francisco Tomorrow Waterfront Committee)

Response

The neighborhood maintenance requirements identified by the commentors are non-environmental issues that are not required to be analyzed in a CEQA document. Litter, additional security needs, and graffiti are not, in themselves, physical environmental changes as defined by CEQA. To the extent that the comments relate to CEQA issues, such as Water Quality, they are addressed under that topic in the EIR and in this Summary of Comments and Responses.

In general, public safety and security of property from vandalism and graffiti are social and economic issues rather than sources of potentially substantial, physical changes in the environment. If a project were to establish a demand for a new police station, it could be appropriate to analyze the physical impacts of the new structure as part of the proposed project. Public security issues were considered in the Initial Study (see pp. A.23 - A.24), as it was determined that the demand for police services at the new ballpark would be similar to that at 3Com Park, and that no additional police station would be needed to accommodate security needs in the vicinity of the new ballpark (see Initial Study, Security of the Neighborhood). Nonetheless, it is recognized that the nuisance effects of such activities could be ameliorated through a neighborhood protection plan, discussed in Mitigation, Neighborhood Protection Plan.

Solid waste issues focus on landfill capacity, production of excess solid waste by a project, and on recycling to divert solid waste from landfills. These issues were considered in the Initial Study (see pp. A.26 - A.27 of the EIR), and the amount of solid waste generated by the new ballpark is reasonably assumed to be the same as that of 3Com Park. As discussed on p. A.27, the amount of solid waste generated could be less because of increased recycling efforts planned for the ballpark.

Under CEQA, litter is an aesthetic rather than an environmental effect. However, in the case of the ballpark, the ballpark's proximity to a waterway requires that litter in water be analyzed as a water quality issue. As discussed on pp. IV.327 and IV.328 of the EIR, litter in the Channel and Bay is inconsistent with the Basin Plan and may pose choking hazards to foraging aquatic wildlife. The litter control mitigation in the Water Quality and Aquatic Ecology section of the EIR (see p. V.69 of the EIR) focuses on those areas that have the highest potential to contribute litter to the water. The areas where litter control is most necessary are the waterside areas, which include the Port Walk, the Lefty O'Doul and Peter Maloney Bridges, and the parking areas south of China Basin Channel. The mitigation measure does not consider litter control elsewhere because it is a city services issue, rather than an environmental issue. See responses under Water Quality and Aquatic Ecology, Litter in Channel and Bay, for further discussion of litter control, and Mitigation, Neighborhood Protection Plan for further discussion of the neighborhood protection plan.

CEQA

Procedural Issues

Comment

I wanted to let you know that it is my perception that the many constructive criticisms that were shared at the Hearing, can assist in creating the most cooperative and effective solutions to the many challenges that this project inherently presents. I feel this EIR process can only be a good and valuable mechanism for all the various sides and sectors, when it is utilized as a focus for resolution. I believe that when the long term outcome is understood in a balanced and educated manner, then all sides will comprehend the essential need to work cooperatively for the mutual benefit of our entire community. (Dennis MacKenzie)

Response

The commentor has aptly summarized the main purposes of the environmental review process under the California Environmental Quality Act (CEQA). City and Redevelopment Agency staff and officials and the project sponsor will work together to use the information in the EIR, particularly mitigation measures and alternatives/variants, in preparing conditions of approval and findings explaining the basis of approval actions, when proposed project is considered for approval.

Comment

I respectfully request that this EIR include within its responsibilities, and written final draft, not only the potential 'worse case scenario', but also the 'best case scenario', Environmental/Social Impact, for the current, and future public and private institutions of our City and County of Saint Francis. (Dennis MacKenzie)

Response

CEQA's primary focus and responsibility is the minimization or avoidance of significant adverse environmental impacts. Therefore, project impacts are described as accurately as possible, and when uncertainty exists, a conservative, reasonable worst-case estimate is made so that the impact analysis identifies the maximum possible impacts that the project would be reasonably expected to produce. This then serves as the basis for developing mitigation

measures capable of reducing the impact to a less than significant level or avoiding the impact. If City and Redevelopment Agency staff and officials believed that developing a best-case project description and impact analysis contributed enough valuable information to the planning, decision, and problem-resolving process, and that it was worth the extra time and expense, such a report could be developed. It would be in addition to the CEQA documents required by state law, but could be included as part of the public record for the project.

Comment

The following comments are made without having yet seen a copy of the "Transportation Background Paper" that is cited frequently in the EIR, but apparently has not yet been distributed to the CAC members nor been made available to the public. (Diane Nygaard)

Response

Information in the Transportation Background Report is repeated in substantial part in the EIR Transportation and Circulation Sections (III.E., IV.E, and V.B) and the Transportation Appendix (X.C.), generally excluding the most technical details. Background reports and referenced material for an EIR are always available for public review at the San Francisco Planning Department offices immediately upon publication of a Draft EIR, as is noted in numerous endnotes throughout the EIR (see, e.g., Note 2, p. IV.45, Note 1, p. IV.74, and Note 1, p. IV.285). A few endnotes inadvertently omitted this reference; the endnote section at the end of Transportation and Circulation, p. IV.236, has been revised to include an indication of the availability of background reports with the following text, similar to that found at the end of Contamination and Environmental Risk (p. IV.305):

> ***A copy of this report is on file for public review at the Office of Environmental Review, Planning Department, 1660 Mission Street, San Francisco.**

Asterisks have been added after references in those notes that did not clearly indicate their availability.

Comment

Also, I would like to say that the horse has finally caught up with the cart. Usually in these projects, we do an EIR before we do the project. This project was brought to the voters prior to the EIR. Now it is time for the EIR to take a close look. (Jeffrey Leibovitz)

Response

The vote on Proposition B resulted in approval of changes to the Planning Code to permit a ballpark at the China Basin site and a statement of policy support for a ballpark at China Basin, but not in final project approval. Additional approvals required are described at the end of Chapter II, pp. II.27 - II.31 of the EIR, and include action on a Redevelopment Plan amendment, on a lease with the Port of San Francisco, and on conformity with BCDC plans and policies. A certified EIR must always be the basis for project approval decisions for projects requiring discretionary approvals and that would potentially cause significant environmental impacts. This EIR and the public review process is the closer look to which the commentor refers.

Public Noticing

Comments

Today we received notice of the requirement to respond to subject Draft EIR by April 30, 1997. Based upon late notice, we have been unable to collaborate all of the facts and verify what additional laws/cases, etc. will apply to this matter. (Kent T. Woodell, Chairman, Sportsmen for Equal Access)

I want to go on record that the Redevelopment Agency has been negligent and inconsistent in their outreach and notification process. Though the community provided them with some of the mailing lists, advance notification of meetings was short, minimal, often incomplete, even Committee members were sometimes omitted. It was even suggested that notification was the community's responsibility. For today's April 17th meeting, we did do a major neighborhood flier distribution effort and have tried neighborhood newsletter announcements whenever lead time allowed, but it is the Redevelopment Agency's responsibility. (Richard C. Millet)

Response

CEQA requires notification of the availability of the Draft EIR and date of any public hearings on the EIR be provided to all organizations and individuals who have previously requested such notice in writing, as well as by one of the following procedures: 1) publishing at least one time in a newspaper of general circulation, 2) posting of a notice on and off the project site in the area where the project is to be located, or 3) direct mailing to the owners and occupants of property contiguous to the parcel or parcels on which the property is located, with owners identified as shown on the latest equalized assessment roll (CEQA Sections 21092 and 21092.2, and CEQA Guidelines, Section 15087 (a)).

The Draft EIR was published on March 14, 1997. The document itself was mailed directly to over 240 government agencies, organizations, individuals, and the media, partially based on persons previously requesting notification. Approximately 700 notices to nearby property owners were also mailed by the City, and the site was posted in advance of the Draft EIR hearing. Notice of the Draft EIR availability was provided by the City in *The San Francisco Independent* on Saturday, March 15, pursuant to standard practice. In addition, two newspaper articles were published in the media about the proposed project and recently released Draft EIR within one week of Draft EIR publication.[61] Finally, there is no separate requirement that fliers be provided or additional notice be prepared for the public hearing in the Draft EIR.

Significance

Comment

Each of the [parking improvement] measures outlined should be accepted by the Giants as part of the project or imposed as mitigation measures. The notion that parking impacts are not considered significant environmental impacts is an unduly narrow reading of CEQA in the context of an urban environment where parking is at a shortage. (Steven L. Vettel, Residential Properties Group)

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61. "Traffic Forecast for New Ballpark," *San Francisco Examiner*, March 15, 1997, Gerald Adams, p. A.1 "Giants' Ballpark Analysis Predicts Traffic Nightmare," *San Francisco Chronicle,* March 20, 1997.

Response

As explained in the EIR on p. IV.214, lack of parking does not produce a measurable physical environmental impact, although it is often inconvenient for those who are unable to locate a space. In fact, providing parking at amounts less than demand is a recognized technique for encouraging use of transit, thereby reducing traffic and related noise and air quality environmental impacts.

Comment

Unfortunately this type of "qualified analysis" permeates the DEIR. The DEIR is full of woulds, coulds, shoulds, mights, and other assumptions. Spend enough money, and almost all impacts can be significantly reduced. There are, however, very few "wills." Consequently, this DEIR is incapable of drawing any meaningful conclusions regarding environmental impacts, particularly with respect to the most significant issue of transportation, which also directly affects air quality impacts. (James Haas)

Response

The EIR does not use the word "will" when describing a proposed project or its impacts in order to be clear that the project has not yet been approved. "Will" is used for already approved actions, such as the discussion in this EIR of the completion of the new I-280 freeway ramps at Fifth and King Streets. The discussion of mitigation measures often includes "should" or "is recommended" when a measure has not been included by the project sponsor as part of the proposal or a modified proposal. Relatively few mitigation measures in the EIR had been finalized as part of the proposed project at the time the Draft EIR was published.

As part of considering the ballpark project for approval, decision-making bodies will consider all of the mitigation measures described in the EIR and will either include the mitigation measures as conditions of approval or reject them, giving reasons for rejection (CEQA Guidelines §15091). See Transportation and Circulation, Transportation Mitigation, General; Project Description, Approvals; and CEQA, Approvals.

Comment

[P]eople are here because we are so concerned and we care so much about our neighborhood. During the scoping phase of the draft EIR, comments were submitted. When I hear there were not any surprises, I found that I was very surprised when I read the EIR documents. Comments were submitted and asked to have issues looked at, including the Vermont Street exit, including Mariposa, including Pennsylvania, including Cesar Chavez Street. These issues have not been adequately mitigated in the document. (Sarah Ames)

Response

CEQA focuses on potentially significant environmental impacts, e.g., substantial adverse changes to the physical environment (CEQA Guidelines Section 15382). The EIR addressed the scoping issues that raised such potential impacts. For example, the intersection of Mariposa and Vermont Streets is analyzed for weekday afternoon and night games (Table IV.E.25, pp. IV.146 - IV.149) as is the Pennsylvania Street/I-280 on-ramp intersection with Mariposa and the Third and Cesar Chavez streets intersection. Exits from U.S. 101 are discussed on pp. IV.127 - IV.128.

Comments

Recirculation of the DEIR is required when the public would otherwise be denied "an opportunity to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom." (*Sutter Sensible Planning, Inc. v. Board of Supervisors* [122 Cal.App.3d 813,822]). *CEQA Guidelines* §15088.5 states that "[a] lead agency is required to recirculate an EIR when a significant new information is added to the EIR...". This includes when "[a] new significant environmental impact would result from the project or from a *new mitigation measure proposed to be implemented*" (italics added) (§15088.5(a)[1]). If mitigation measures are proposed that are not included in the EIR (such as for those impacts that have not yet been declared "significant"), then these mitigation measures must go through environmental review. This will require a recirculation of the DEIR.

In any event the lack of impacts identified as significant, mitigation measures to reduce significant impacts, and alternatives designed to eliminate significant impacts, results in an "EIR that is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded" (§15088.5(a)[4]). (Scott MacPherson)

It is unacceptable that an appendix section identifying the significant impacts is not included. (L. Joseph Boss)

The DEIR's discussion of impacts, including specifically those about the South Beach neighborhood, seems hesitant to conclude that fairly significant impacts will occur, even though the evidence about the impacts is presented and discussed, and logic would lead to the resulting conclusions. (Douglas G. Wright)

Response

CEQA Guidelines Article 9, Contents of Environmental Impact Reports, Section 15120(a), stipulates that EIRs must contain the required content as specified under Article 9, but that the format of the document may vary. The Section goes on to say that when required elements, such as significant impacts (see Section 15126(a)), are not separated into distinct sections, that the document shall state where in the document each element is discussed. Therefore, it is important to note that CEQA does not specifically require an appendix identifying significant impacts. The EIR focuses on the significant environmental effects of the proposed project in Chapter IV, Environmental Impacts. Chapter I, Summary, summarizes the environmental impacts and available mitigation measures. Finally, Chapter VI, Other CEQA Concerns, Section A, Significant Environmental Effects that Cannot be Avoided if the Proposed Project is Implemented, discusses the impacts identified as significant; they are traffic and air quality impacts that can not be avoided with the implementation of all feasible mitigation measures. The ultimate determination of unavoidable adverse significant environmental impacts is made by the Planning and Redevelopment Agency Commissions in their certification action, following review of the responses to comments received on the Draft EIR and review of revisions to the Draft EIR text. In addition, each approving agency would have to make findings regarding adoption or rejection of alternatives and mitigations (see Project Description, Approvals).

If new information or conditions arise that would require recirculation under CEQA, the City would recirculate such information in a manner that complied with CEQA and that would not deprive the public of a meaningful opportunity to comment. Based on the Response provided elsewhere in this Summary of Comments and Responses document, no substantial revisions or new information showing new significant environmental impacts not disclosed in the Draft EIR have been raised either in the comments or in responses prepared to these comments. It

appears that other concerned citizens were able to review the document and provide comments, some of which disagreed with various determinations of significance in the Draft EIR. Responses clarify many points raised in the Draft EIR and expand on others, but do not suggest new significant impacts.

Comment

There is no section outlining significant impacts that this project will have on the area. (Michael Karasik, Bayside Village Associates)

Response

Chapter VI., Other CEQA Concerns, A. Significant Environmental Effects that Cannot Be Avoided if the Proposed Project is Implemented, describes significant adverse environmental impacts of the project. Those effects, which would be significant, even with implementation of feasible mitigation measures, include cumulative traffic effects, cumulative impacts on transit service, and certain noise and air quality effects. Additionally, the Summary section of the EIR provides a synopsis of major environmental effects and mitigation measures.

Comment

While the DEIR generally did a good job of analyzing impacts related to those environmental concerns studied, it is inadequate in recommending measures to mitigate those impacts. We believe this is the result of the drafters of the DEIR incorrectly finding many adverse impacts not significant, possibly based on a mistaken belief as to the number of residents in the surrounding area. The DEIR never quantifies that figure, even though in South Beach alone, there are approximately 6,000 residents in 2,600 dwelling units, with another 1,100 units to be completed prior to the year 2000, for a total of approximately 8,500 residents.

We believe many more impacts must be considered significant and have suggested additional measures to mitigate the impacts discussed, as well as measures to mitigate the neighborhood quality-of-life impacts never discussed in the DEIR. (Steven L. Vettel, Gladstone & Vettel)

Response

Significant environmental impacts have been identified in Chapter IV and Chapter VI of the EIR. The number of local residents near the project site is not generally used as a criterion for the significance of impacts in an urban area, especially one that is as densely populated as

is San Francisco, where all sites are relatively near substantial residential populations.

Quality-of-life issues are discussed under Land Use, Neighborhood Effects/Quality of Life.

Comments

The EIR does not identify significant impacts. This is not an oversight, but is a conscious and ongoing pattern and practice of the City. The City's EIR Instructions and Guidelines (July 1988) to consultants states the following:

> "Avoid judgments in the environmental document as to the significance or magnitude of impacts. Since the purpose of an environmental document is to present decision makers and the public with a neutral, factual tool, readers must be allowed to make up their own minds as to what is significant based on the data provided. Words such as "significant," "insignificant," "positive," "negative," "adverse," "beneficial," "large," "small," "major," "minor," imply a value judgment and do not belong in an environmental document in San Francisco. Numbers, when available, speak for themselves. A change of 0.01% is obviously not significant; you don't have to say so." (page 17)

Significant effects must be identified in an EIR. The discussion following CEQA Guidelines §15064 states:

> "The determination of significance is one of the key decisions in the CEQA process. The decision leads to the preparation of either a Negative Declaration or an EIR which involves the additional requirements to investigate the significant effects, to propose mitigation measures and alternatives, to respond to public comments, and to make findings on the feasibility of changing the project to reduce or avoid significant effects."

In other words, without a determination of significance, mitigation measures and alternatives cannot be identified for significant impacts, and public comment on the determination of an effect as significant or less-than-significant is impossible.

Section 21002.1 of the CEQA Statutes states, in part, that "[t]he purpose of an environmental impact report is to identify the significant effects of the project on the environment" [emphasis added]. According to the CEQA Guidelines §15126(a), "[a]n EIR shall identify and focus on the significant environmental effects of the proposed project" [emphasis added]. CEQA Guidelines §15126(c), states that the EIR "shall identify mitigation measures for each significant environmental effect identified in the EIR" [emphasis added]. While the ultimate determination of significance is determined by City decision-makers and is incorporated into findings, this does not excuse the lead agency from identifying significant impacts in the EIR.

The City's method is also in direct violation of CEQA Guidelines §15065, to make mandatory findings of significance for certain impacts. The Court has ruled that these impacts are significant "[b]y definition" (Mira Monte Homeowners Association v. Ventura County (165 Cal.App.3rd 357, 364). See also Friends of 'B' Street v. City of Hayward (106 Cal.App.3d 988, 1000), in which the Court stated "[i]n specified instances proposed projects must be found to have a significant effect on the environment" (emphasis in original). This is so that agencies can "take the actions at the different stages of the process that are required with significant effects" (discussion following CEQA Guidelines 15065).

In regards to the statement that a "change of 0.01% is obviously not significant", this contradicts current case law. In Kings County Farm Bureau v. City of Hanford (221 Cal.App.3rd 692, 718) the court stated in a case concerning cumulative air impacts that "[t]he relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting conditions, but whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin" (emphasis added). In other words, a very small change (such as 0.01% could very well be significant in some circumstances.

The City's failure to provide information on the significance of impacts thwarts the statutory goals of CEQA. This lack of a good faith effort at full disclosure is a prejudicial abuse of discretion.

According to Citizens of Goleta Valley v. Board of Supervisors (52 Cal.3d 553), "[t]he core of an EIR is the mitigation and alternatives sections". CEQA Guidelines §15126(a) states:

> "An EIR is an informational document which will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

The identification of significant effects is an essential prerequisite in developing mitigations and alternatives. For example, CEQA Guidelines §15126© requires the EIR to "describe measures which could minimize significant adverse impacts. (emphasis added)" Mitigations for significant impacts cannot be developed without first identifying which impacts are significant. Using the City's strategy of waiting until the decision-makers find which impacts are significant would require that every effect identified in the EIR have mitigation measures, just in case the effect is found to be significant. This is not the case in the instant DEIR.

CEQA Guidelines §15126(d) requires the EIR to "describe a range of reasonable alternatives...[which] would avoid or substantially lessen any of the significant effects of the project" (emphasis added). Alternatives cannot be developed to reduce the significant effects of the project without first identifying what those impacts would be. Without the identification of significant impacts to avoid or lessen, the development of alternatives is a useless exercise.

As another example, recirculation of an EIR is required when "a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented" (CEQA Guidelines §15088.5(a)(1)). Following the City's method, this section of the Guidelines is moot because no significant impact would ever [be] identified until findings were written, after the Final EIR is certified. Note that this is one of the many changes in CEQA that have occurred after the publication of the City's's EIR Instructions and Guidelines. The City's guidelines have not been revised to conform with recent legal requirements (the recirculation section of the CEQA was added in 1993, five years after the City's 1988 Instructions).

Requiring the "readers to make up their own minds as to what is significant" assumes that readers know current regulatory or policy-based significance criteria, such as air quality standards from the BAAQMD, toxics thresholds from U.S. EPA, or thresholds established by policies of the City's Master Plan. This puts the burden on the public to seek out regulatory standards and City policy documents and interpret the results.

As stated in the CEQA Guidelines §15201, "public participation is an essential part of the CEQA process". CEQA Guidelines §15200 states that the lead agency must seek out public comment to, among other reasons, check for accuracy, solicit counterproposals, disclose agency analysis, and share expertise. Restricting the determination of significance deprives the public of the meaningful opportunity to comment. In addition, data appearing at a later stage (such as the determination of significance and mitigation measures) without being subjected to the critical evaluation that occurs in the DEIR could lead the decision-makers to believe that there is no controversy due to the lack of critical comment, and could lead to errors going unnoticed (see the Federal NEPA case, Appalachian Mountain Club v. Brinegar, 394 F.Supp. 105, 121-122).

As significance of an impact is not determined until after the close of the public review period, it is impossible to obtain public input. Similarly, readers cannot comment on mitigation to many effects in the EIR, as it has not been developed. For example, the EIR on page IV.41 states that "residents...may experience some annoyance from lighting effects [from outfield and right-field banks] on occasion of nighttime games. This would be a localized, temporary, and intermittent effect during the approximately 40 games per season". However, no mitigation for this "effect" is included into the EIR. Presumably, if readers are to "make up their own minds" as to what is significant (including decision makers), then each effect should also have mitigation in the event that decision makers found the effect significant. Without such information, public comment on mitigation is impossible. The City's strategy of not including mitigation (because no significant effect was identified), if taken to the logical end, would result in an EIR that includes absolutely no mitigation at all, and instead all mitigation would be developed only during findings. [This] clearly violates the intent of CEQA and a long history of case law requiring public input on mitigations. "Whatever is required to be considered in an EIR must be in the report itself" (Santiago County Water District v. County of Orange, 118 Cal.App.3d 818, 831).

In cases where the lead agency has neglected to identify the significance of an impact, the CEQA Guidelines states that the impact is assumed to be significant:

> "Because CEQA requires an EIR to analyze the significant effects of a project, the selection of an impact for analysis may be at least by implication an identification as significant. This selection and identification occurs long before the EIR reaches the decision-makers. [emphasis added] Further, the Lead Agency is required to make a finding on each significant effect identified in the EIR. The decision-making body is not necessarily bound by the designation of an effect as significant, but the decision-makers would need to have a reason in the record to support their change. As shown in the case of Cleary v. County of Stanislaus, 118 Cal. App. 3d 327, if the decision-making body does not make the change in the designation of an effect as significant in the EIR, the decision-makers will be bound by that designation and will not need to make a finding on the feasibility of mitigating that effect". (CEQA Guidelines discussion under 15126).

The only effects that are not considered significant in the EIR are those clearly labeled as less than significant:

> "An EIR must contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. Such a statement may be contained in an attached copy of an Initial Study. (Guidelines 15128)

No such statement occurs in the Draft EIR. Therefore, the attached Initial Study (Appendix A of the Draft EIR) serves to indicate effects found not to be significant (pages A.12-A.13). It can be assumed that all other effects identified in the Initial Study and the Draft EIR are considered significant. No mitigation is provided for these significant effects in the EIR.

In addition, impacts as discussed in Appendix G of the CEQA Guidelines are "normally" significant. The Court has stated that this Appendix establishes rebuttable presumptions that these impacts are significant (Quail Botanical Gardens Foundation, Inc. v. City of Encinitas, 29 Cal.App.4th 1597). Therefore, unless contrary evidence is presented, these impacts are presumed to be significant. No evidence is shown in the EIR and no statement has been made that these impacts are considered less-than-significant. (Scott MacPherson)

According to CEQA Guidelines §15123(b), "[t]he summary [of an EIR] shall identify: 1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect". The EIR does not identify significant effects. As described above, mitigation measures have not been proposed for each effect (that are presumably significant, as described above) in the EIR. (Scott MacPherson)

Response

All potentially significant impacts that could result from the proposed project have been analyzed in Chapter IV. In addition, that chapter includes discussion of some effects determined not to be significant (see, e.g., the discussions of parking and construction transportation impacts on pp. IV.214 and IV.232 of the EIR). In addition, where state or federal standards are relevant, project effects are compared with those standards (see, e.g., Air Quality and CO emissions, p. IV.274).

Ultimately, the Lead Agency (here, the Planning Commission and the Redevelopment Agency Commission) determines which impacts are significant, based upon the information contained in the EIR.

The City process is as follows: The initial study identifies less than significant impacts and potentially significant impacts. The EIR examines potentially significant impacts. Where the EIR analysis indicates that an impact is significant, the EIR proposes mitigation measures. The EIR also identifies unavoidable significant impacts (Chapter 6) where mitigation measures do not reduce an adverse environmental impact to a less than significant level. With respect to the City's staff guidelines mentioned by the commentor, those guidelines are a set of general instructions. They are not the entirety of the body of knowledge utilized by staff in implementing CEQA which includes working knowledge and experience of all staff and their supervisors plus updates to current practice and law that are obtained from a variety of sources, as is typical in any professional environment. Staff are well aware of the current law and applicable guidelines. However, a few points in response to the commentor are appropriate. The general instruction to avoid judgments of impacts was for purposes of neutrality, i.e., not to arbitrarily weight information when the reader has the tools to make that judgment by him or herself. To that end, applicable criteria such as air quality standards or hazards thresholds are identified in EIRs. Nonetheless, the City does identify mitigation measures for potentially significant impacts and does identify unavoidable significant impacts in the EIR, as appropriate, consistent with the description of the EIR process above.

Comment

Chapter VI. – Significant Environmental Impacts Section is inadequate. The fact that this "chapter" is three pages long makes the point. It's just not there.

This chapter should summarize impacts based on mitigation measures that have been committed to, both in terms of policy and available resources that are likely to be drawn upon. Decision-makers and the public have a right and legal requirement, to know probable significant environmental impacts. (Martin Fay, Rincon Point – South Beach CAC)

Response

The EIR sets forth in Chapter V mitigation measures that the agency can adopt.

The commentor has misunderstood Chapter VI, Section A. Chapter VI, Other CEQA Concerns, addresses two requirements of CEQA, one of which is Section A., Significant Environmental Effects that Cannot Be Avoided if the Proposed Project Is Implemented. That is, Section A discusses those adverse environmental impacts that would remain significant after all feasible mitigation measures were implemented. This may be because either no feasible mitigation measures exist or because feasible measures cannot reduce the impact to a less than significant level. At the time of project approval, not EIR certification, CEQA requires the commitment by the decision-making lead agency to adopt feasible mitigation measures to lessen or avoid significant adverse environmental impacts. The inclusion of mitigation measures in the EIR does not require the lead agency to adopt them. If the lead agency decides to approve the project the agency issues findings that show for each significant environmental impact: that changes have been incorporated in the project to avoid or lessen the impact; that the lead agency lacks jurisdiction to make the change but another agency has the authority; or that specific legal, economic, social, or other considerations make the mitigation measures infeasible. The lead agency may thus adopt findings of overriding considerations for impacts that would remain significant after all feasible mitigation measures were implemented. CEQA also requires the adoption of a mitigation monitoring program at the time of project approval to ensure the implementation of mitigation measures. Based on the responses in CEQA, EIR Format and Context, the significant environmental impacts identified in the EIR have mitigation measures proposed in

Chapter V. Mitigation Measures, and the ones that would remain significant after mitigation are discussed in Chapter IV, Section A.

The comment demonstrates a clear understanding of the EIR format for presenting significant environmental impacts. The EIR complies with CEQA requirements and pursuant to CEQA (Section 21082) was prepared according to the City and County of San Francisco standard format guidelines for EIRs. Mitigation measures have been developed to reduce otherwise significant effects. Less-than-significant adverse impacts are not represented in the mitigation measures chapter. The implication is that, subject to the final decision of the San Francisco Planning Commission, all of the impacts discussed in the report for which a mitigation measure has been identified would be significant. Furthermore, Chapter VI identifies the traffic and air quality impacts where implementation of feasible mitigation measures would not reduce impacts to less than significant.

Various format elements of the EIR are intended to facilitate the reader's ability to connect significant impacts with related mitigation measures. For example, the mitigation measure of Chapter V are divided among the same topical areas discussed in Chapter IV. Environmental Impacts. The text of each measure identifies its intended purpose. In cases where CEQA or regulatory authorities have adopted formal significance criteria, these criteria are described.

All of the significant environmental impacts that would result from the proposed project have been disclosed in Chapter IV. Environmental Impacts. The EIR does, nevertheless, discuss some issues that are less than significant in order to establish the basis for determining the appropriate level of significance (subject to the final decisions of the Planning Commission). Less-than-significant impacts can be distinguished from significant impacts through the format elements described above. For example, less-than-significant impacts can be inferred by the absence of corresponding mitigation measures in Chapter V.

D. STAFF-INITIATED TEXT CHANGES

The following text changes correct errors and update information provided in the Draft EIR.

The third sentence in the last paragraph on p. I.3 has been revised to read:

> **By placing seating in the field, the ballpark's capacity for large special events could exceed 50,000 people; such events would occur no more than ~~be likely to occur up to~~ five times per year.**

The second sentence of the first paragraph on p. I.4 has been revised to read:

> **The primary scoreboard, located in centerfield, ~~is~~ would be about 125 ft. above the playing surface at its highest point.**

The second sentence of the second paragraph on p. I.30 has been revised as follows:

> **During the 3:30 to 4:30 p.m. time period an additional six intersections would deteriorate to LOS E or F compared to the existing-plus-project conditions, one of ~~these~~ which would already be at LOS E (see Table I.B.3b).**

The second sentence of the measure listed under Cultural Resources on p. I.54 has been revised as follows:

> **If, after testing, the archaeologist determines that further investigation is necessary, additional measures to be determined by the archaeologist and the Environmental Review Officer could include on-site monitoring of excavation and evaluation of any archaeological resources encountered.**

The following revision has been made to the last sentence of the last paragraph on p. II.4:

> **The Port of San Francisco has the authority to operate, maintain, regulate and improve the ~~harbor~~ Bay properties of San Francisco that were transferred in trust to the City and County of San Francisco from the State of California through the Burton Act in 1968.**

The last sentence of the last paragraph on p. II.13, which continues on p. II.14, has been revised as follows:

> **The primary scoreboard, located in centerfield, ~~is~~ would be approximately 125 ft. above the playing surface at its highest point with dimensions of 60 ft. high by 160 ft. wide.**

The following revision has been made to the first sentence of the last paragraph on p. II.15:

> **A loading dock area ~~is~~ would be located off King Street near Second Street underneath the left-field bleacher seating.**

The first sentence of the last paragraph under "Parking South of the Channel" on p. II.19 has been corrected as follows:

> **To insure safety and security of parking areas, the design may include: landscaping, lighting, fencing, entrance gates and appropriate signage at street level to direct ballpark ~~Figure II.D.5: South of Channel Parking Areas~~ parking traffic.**

The next-to-last sentence of the last paragraph on p. II.23 has been corrected as follows:

> **Overall, 11 buildings containing about 427,000 sq. ft. would ~~Figure II.D.6/7: North/King Street Elevation South/Port Walk Elevation~~ be demolished.**

The last sentence of the first paragraph on p. II.27 has been revised as follows:

> **These amendments include modifications to the Urban Design, Recreation and Open Spaces, and Northeastern Waterfront Area Plan elements as described in the "Proposed Ballpark Master Plan Amendments" published by the Planning Department on June 20, 1996 and described further in III.A. and IV.A. Consistency with Plans and Policies.**

The last bulleted item on p. II.31 has been revised as follows:

- **Regional Water Quality Control Board: approval of soil remediation plan; review of Soil Management Plan.**

The following revision has been made to the second sentence of the first paragraph on p. III.3:

> **The General Plan includes the following ~~E~~elements: *Land Use*; *Commerce and Industry*; *Residence*; *Transportation*; *Urban Design*; *Recreation and Open Space*; *Community Facilities*; *Environmental Protection*; ~~and~~ *Energy*; *and Community Safety*.**

The sentence following the bulleted list on p. III.4 repeats the information presented in endnote 1 on p. III.24. This sentence has been therefore been deleted.

The reference mark for endnote 6 has been moved from the partial paragraph at the top of p. III.10 to the end of the first sentence of the last paragraph on p. III.9.

A new endnote reference mark has been added to the first sentence of the first paragraph on p. III.11:

> **In March 1996, the area bounded by King Street, Second Street, Third Street, Second Street right-of-way from King Street to Berry Street, and the China Basin Channel was designated the Northeast China Basin Special Use District by adding Section 249.[18][7] to the San Francisco City Planning Code pursuant to Proposition B, a measure which received majority support in the March 1996 election.**

A new endnote that corresponds to the paragraph above has been added to p. III.24 and the subsequent endnotes in this section have been renumbered to accommodate this addition.

> **7. Proposition B referred to Section 249.[14] which was later changed to 249.[18].**

The titles of plans cited in endnotes 4, 5 and 6 on p. III.24 have been revised as follows:

4. City and County of San Francisco, Department of City Planning, *Northeastern Waterfront Area Plan*, adopted by City Planning Commission Resolution 7643, January 31, 1980 and as amended.

5. City and County of San Francisco, Department of City Planning, *Northeastern Waterfront Area Plan*, adopted by City Planning Commission Resolution 7643, January 31, 1980 and as amended.

6. City and County of San Francisco Department of City Planning, *Central Waterfront Area Plan*, adopted by City Planning Commission Resolution 8631, July 3, 1980.

The last sentence of the first paragraph on p. III.62 has been revised as follows:

In addition, the study area encompasses the various public transit modes—rail, bus, and ferry—that would potentially serve the ballpark.

Table and page references in the last sentence on p. III.65, which continues on p. III.66, have been corrected as follows:

LOS is ranked from A to F, with A representing very good conditions, and F representing the worst, most congested conditions (see Appendix C, Table X.C.1, p. A.8598 for definitions of freeway levels of service).

The third sentence of the paragraph under King Street on p. III.75 has been corrected as follows:

King Street between Third Street and the I-280 ramps/Fifth Street is scheduled to be open to traffic by ~~June~~July 1997.

A page reference has been corrected in the last sentence of the paragraph under Traffic Conditions on p. III.84 as follows:

Further description of the LOS methodology is presented in Appendix C, pp. ~~A.91~~A.92 - A.96, and in the Background Transportation Report.

The first sentence of the first paragraph under Transportation Element of San Francisco's General Plan on p. III.104 has been corrected as follows:

> **As discussed in ~~II. Project Description~~III.A. Consistency with Existing Plans and Policies, p. III.3, the *San Francisco General Plan,* adopted by the Planning Commission, is the comprehensive, long-term general plan that contains land use and development policies for San Francisco.**

A date in endnote 19 on p. III.110 has been corrected as follows:

> **19. Robert L. Harrison, Transportation Planning, China Basin Ballpark Parking Survey, ~~November 1994~~ March 1995.**

A page reference has been added to endnote 5 on p. III.122 as follows:

> **5. Appendix D of this EIR, p. A.137, includes a brief discussion of noise information from some federal and state agencies.**

Endnote 21 on p. III.147 is revised as follows:

> **21. California Division of Mines and Geology, *State of California Seismic Hazard Zones*, ~~Preliminary Review Map~~, *South Half of the San Francisco North and Port of the Oakland West Quadrangles*, released ~~October~~ March 1, 1996, scale 1:24,000. ~~This map will be superseded by the official map on March 1, 1997.~~**

A page reference has been corrected in the next-to-last sentence of the paragraph under "Potential Subsurface Contamination" on p. III.156 as follows:

> **The results of the analyses are presented on pp. IV.290 - ~~IV.294~~ IV.295.**

The next-to-last sentence of the first paragraph on p. III.166 has been revised as follows:

> ~~Storm water permits for construction and industrial activities~~The General Industrial Activities Storm Water Permit and the General Construction Activity Storm Water Permit **require the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP).**

A figure reference has been corrected in the first sentence of the last paragraph on p. III.177 as follows:

> **The shallow groundwater survey performed on the site included the installation and sampling of 18 temporary well points (see Appendix F, Contamination and Environmental Risk, Figure ~~X.F.1~~X.F.3, p. ~~A.159~~A.162 for locations).**

A figure reference has been corrected in the second sentence of the first complete paragraph on p. III.178 as follows:

> **However, benzene, toluene, ethylbenzene, total xylenes, and phenolic compounds occur at elevated concentrations in groundwater from one sampling location at well point WP-06, which is in the northern portion of the site near King Street (see Appendix F, Contamination and Environmental Risk, Figure ~~X.F.1~~X.F.3, p. ~~A.159~~A.162 for its location).**

A page reference has been added to the first sentence of the second complete paragraph on p. III.178 as follows:

> **As discussed in III.I. Contamination and Environmental Risk, p. III.160, BTEX and the phenolic compounds appear related to coal gasification waste.**

The last sentence on p. IV.1 is revised as follows:

> **Some of the proposed amendments provide updated background information that ~~will be~~ is noted if it is relevant to the comparison of existing plans and policies with the proposed project.**

The second sentence of the first complete paragraph on p. IV.22 has been revised as follows:

> **Ball games would occur about 80 times over a seven-month season, whereas all other activities and events would attract substantial numbers of visitors year-round.**

Figure IV.E.1, p. IV.80, had a printing error in some copies of the Draft EIR. This figure has been reprinted for the Final EIR.

The next-to-last sentence of the partial paragraph on the top of p. IV.82 has been revised as follows:

> **MUNI is also proposing to implement changes to CalTrain express lines 80X / 81X / 82X in 1998 that would consolidate the three lines ~~—80X, 81X and 82X—~~into two ~~lines~~.**

The last sentence on p. IV.104 has been revised as follows:

> **Therefore, the impacts of these events would be less than impacts analyzed and described for a baseball game with ~~39,000~~39,500 or more fans in attendance.**

The first sentence of the second paragraph on p. IV.111 has been revised as follows:

> **Trip generation for the proposed project includes the Giants administrative offices (31,000 sq. ft.), restaurant uses totaling ~~45,000~~35,000 sq. ft., ground-floor retail space (43,000 sq. ft.), PacBell Center (31,000 sq. ft.) and a broadcast studio (31,000 sq. ft.).**

A page reference in the last sentence of the third paragraph on p. IV.111 has been corrected as follows:

> **Conversion of peak hour person trips to peak hour vehicle trips is discussed in the Mode Split subsection, pp. ~~IV.99 - IV.100~~IV.112 - IV.114.**

The second sentence of the first paragraph on p. IV.124 has been revised as follows:

> **Where freeway ramps form intersections with local streets, the impacts at the ramp are analyzed in the intersection discussion later in this section beginning on p. IV.144.**

Figure IV.E.3 on p. IV.153 has been corrected to show the level of service change at the intersections of Harrison at Second, Folsom at Second and Mariposa at Third is LOS F. Revised Figure IV.E.3 is shown on the next page.

The next-to-last sentence of the first paragraph under Cumulative Weekday Afternoon (3:30 - 4:30 p.m.) Post-Day Game on p. IV.159 has been revised as follows:

> **Six intersections would deteriorate to LOS ~~E or~~ F (see Table IV.E.25, p. IV.146).**

The lead-in to the bulleted items on p. IV.166 has been revised as follows:

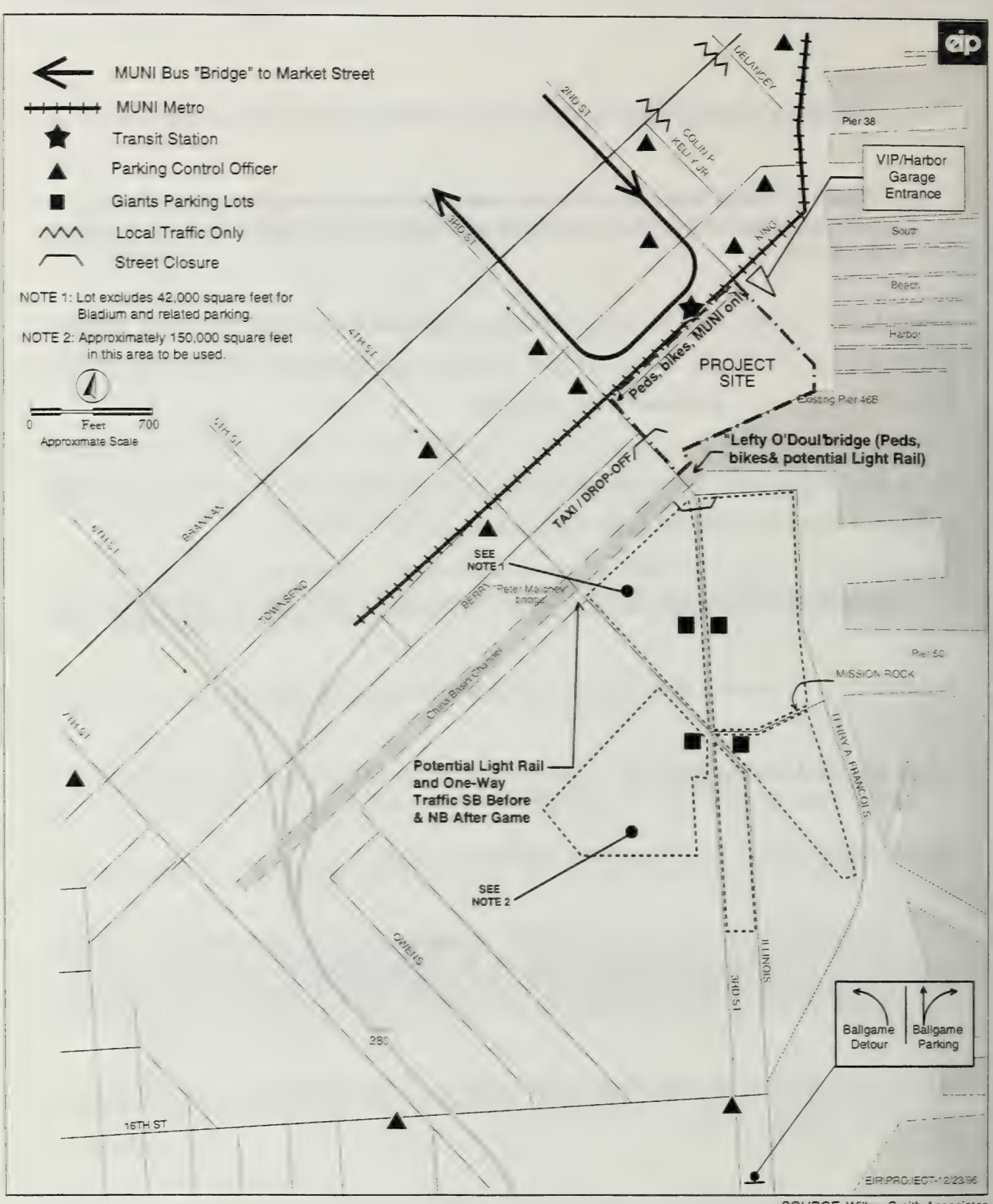
> **The ~~10~~11 intersections are:**

The last sentence on p. IV.177 has been revised as follows:

> **Increases are measured at four MUNI screenlines and one subscreenline (Market Street) described on pp. III.92 - III.94. ~~as~~ These screenlines are shown in ~~III.E. the Background~~ Transportation Report ~~and Circulation~~, Figure 2-16, following p. 2-29.**

The following addition has been made to the source for Table IV.E.30 on p. IV.182 and Table IV.E.31 on p. IV.184:

> **Source: Telephone conversation with David Makofsky, MUNI schedules, Data Service, 1/2/97; and Wilbur Smith Associates.**



SOURCE: Wilbur Smith Associates

GIANTS BALLPARK

Figure V.B.1 Recommended Traffic Routing Plan

The next-to-last sentence of the first paragraph on p. IV.199 has been revised as follows:

Impacts of pedestrians and bicyclists are discussed ~~in the next section of this chapter~~on pp. IV.215 - IV.224.

Note 3 in Table IV.E.38, p. IV.207, has been corrected as follows:

3. **Available public parking accounts for reduction of approximately 350 total public, off-street spaces that would be removed from existing surface lots due to development and construction of transportation improvements. Varying numbers of these spaces would have been available, depending on the time of day and the occupancy of various lots, but have been subtracted from the supply due to assumed development (see text endnotes ~~43 and 44~~45 and 46).**

In Table IV.E.39 on p. IV.210, the note reference mark next to the column Weekday Afternoon has been changed from 1 to 2. In addition, note 3 has been corrected as follows:

3. **Available public parking accounts for reduction of approximately 350 total public, off-street spaces that would be removed from existing surface lots due to development and construction of transportation improvements (see text endnotes ~~43 and 44~~45 and 46 for more explanation).**

The following heading has been added between the second and third complete paragraphs on p. IV.214:

Parking Improvement Measures

The following correction has been made to the first sentence of the last paragraph on p. IV.230:

The existing conditions parking survey indicates that all on-street public parking spaces are occupied and that a total of 211 off-street spaces are available (weekday, midday) within a 10-minute walking distance of the site. This

represents a shortfall of about 210 off-street public spaces under peak period construction conditions.

The following correction has been made to the second sentence of the last paragraph on p. IV.232:

This estimate is based on a rough calculation of 300 to 430 sq. ft. per parking space.

A page reference was missing from note 2 in Table IV.F.1, on p. IV.246. The following correction has been made to this note:

2. Refer to Figure III.F.1, p. III.116, for location of sites.

The fourth and fifth sentences in the second full paragraph on p. IV.247 have been revised as follows:

Weekday night games are expected to occur about 42 days per year (see IV.E. Transportation and Circulation, p. IV.77); in addition, there could be an occasional weekend night game, ~~and possibly~~ one to five large nighttime events, and several additional sold-out non-ballgame events, annually. Thus, noise impacts along this section of Mariposa Street could occur ~~approximately 40 to 45~~ times or more per year and would last about one hour during the peak travel time before a ballgame.

A page reference was missing from note 1 in Table IV.F.2, on p. IV.249. The following correction has been made to this note:

1. Refer to Figure III.F.1, p. III.116, for a map showing locations.

The first sentence of the first paragraph under UCSF/Mission Bay Cumulative Scenario (Year 2015) Traffic Noise on p. IV.250 has been revised as follows:

As described in the Transportation Impact analysis methodology discussion, pp. IV.108 - IV.109, a second cumulative growth scenario was analyzed including the new major campus under consideration by the University of California at San Francisco (UCSF) in the southern portion of the Mission Bay planning area, plus additional development by Catellus Development Corporation in the Mission Bay South of Channel area (see IV.E. Transportation and Circulation, pp. IV.108 - IV.110 for more detail on the assumptions used to develop this second cumulative scenario).

A page reference has been corrected in the next-to-last sentence of the first paragraph under Ballgame Crowd Noise Impacts on p. IV.251:

Figure IV.F.2, p. ~~IV.249~~ IV.253 shows these analysis locations.

In Table IV.F.5, on p. IV.260, the location listed for Fa, Fb and Fc has been revised as follows:

Fa[4]	**~~Proposed~~Approved Apartments**
	North of King Street and
Fb[4]	**East of 2nd Street**
	(ground, mid-, and top
Fc[4]	**levels)**

Note 9 on p. IV.263 has been revised as follows:

9. Smith, Fause & McDonald, Inc.,~~Wilson, Ihrig & Associates,~~ Shoreline Amphitheater Sound Propagation Testing, November, 1992.

The last sentence of the second paragraph on p. IV.265 has been revised as follows:

No significant change is expected for the PM_{10} emission rate, relative to 1996, in either year (more detail on PM_{10} analysis methods is available in Appendix E, Air Quality, pp. A.144 - A.145).

In Table IV.G.1, p. IV.267, the total NO_x for Year 2015, Project, shown as 409, has been corrected to 407.

The following correction has been made to the first sentence of the first paragraph on p. IV.271:

> **Vehicular ROG, NO_x, and PM_{10} emissions from an afternoon game at the proposed ballpark plus the daily use of the other proposed land uses would amount to 287 lb., ~~409~~407 lb., and 875 lb., respectively (see Figure IV.G.2, p. IV.269).**

The following revision has been made to the second paragraph on p. IV.272:

> **Traffic conditions specified in the following five traffic scenarios, as calculated by the project transportation consultants (see Transportation and Circulation Impacts, pp. IV.105 - IV.110, for a description of thesetwo cumulative scenarios), were established for the local CO analysis:**

The next-to-last sentence of the first complete paragraph on p. IV.276 has been revised as follows:

> **At 7.7 ppm the CO levels at this location would remain well under the state and federal one-hour standard (see note ~~2~~1 in Table IV.G.2, p. IV.275, for state and federal standards).**

The following page reference has been added to the last sentence on p. IV.278:

> **Such emissions could be as high as 51 lb/acre/day for each construction site (see Appendix E, Air Quality, pp. A.143 - A.145, for calculation of construction-related PM_{10}):**

The following correction has been made to the first sentence of endnote 8 on p. IV.279:

> **The UCSF/Mission Bay cumulative scenario is described in more detail in Transportation and Circulation Impacts ~~pp. IV.E~~ sections.**

A page reference has been corrected in the first sentence of the first paragraph on p. IV.286 as follows:

Site investigations indicate that portions of surface and subsurface soil and groundwater at the ballpark site are contaminated (see III.I. Contamination and Environmental Risk, pp. ~~III.56 – III.57~~III.156 - III.157 and III.J. Water Quality and Aquatic Ecology, pp. III.176 - III.178).

A page reference has been corrected in the first sentence of the first paragraph under "Risks to Human Health" on p. IV.288 as follows:

Although chemicals have been detected in soil and groundwater (see III.I. Contamination and Environmental Risk, pp. ~~III.56 – III.57~~III.156 - III.157, and III.J. Water Quality and Aquatic Ecology, pp. III.176 - III.178) at the project site, not all of the chemicals are present at concentrations that may be of toxicological concern.[4]

Page references have been corrected in the partial sentence at the top of p. IV.291 and in the subsequent sentence as follows:

...soil at various depths, locations and concentrations across the project site (see III.I. Contamination and Environmental Risk, pp. ~~III.155 – III.156~~III.160 - III.161). Concentrations of these chemicals in groundwater were low (see III.J. Water Quality and Aquatic Ecology, pp. ~~III.176 – III.177~~III.177 - III.178).

The following change has been made to the first sentence of the first complete paragraph on p. IV.296:

Since coal tar was observed in several historical borings and three recent borings at depths below 10 feet (ft.) below ground surface (bgs), it is possible that coal tar may be encountered during some of the deeper excavation work at the site.

A page reference has been corrected in the first sentence of the last paragraph on p. IV.308 as follows:

As discussed in III.J. Water Quality and Aquatic Ecology, ~~p. III.167~~pp. III.173 - III.174, storm water on approximately the northern half of the 12.5-acre ballpark construction site drains into City sewers along King Street and Berry Street.

A page reference has been corrected in the second sentence of the last paragraph on p. IV.310 as follows:

> **The *Soil Management Plan* was prepared in conjunction with the *Site Investigation Report and Risk Evaluation* performed for the ballpark site (see IV.I. Contamination and Environmental Risk, pp. IV.297 - IV.300, and Appendix F, Contamination and Environmental Risk, pp. ~~A.146 - A.164~~A.152 - A.153).[5]**

A page reference has been corrected in the first sentence of the last paragraph on p. IV.320 as follows:

> **As discussed in III.J. Water Quality and Aquatic Ecology, p. ~~III.173~~III.172, California sea lions and harbor seals forage in China Basin Channel.**

A page reference has been added to the next-to-last sentence of the second paragraph on p. IV.321 as follows:

> **As discussed in III.J. Water Quality and Aquatic Ecology, p. III.178, the organics in the coal tar near the most concentrated area of contamination are binding the contaminants to the soil, limiting the effect on groundwater and extent of migration.**

A page reference has been corrected in the last sentence of the first paragraph on p. IV.323 as follows:

> **See V.F. Water Quality and Aquatic Ecology, ~~pp. V.66 - V.71~~p. V.70, for measures addressing drainage improvements for those areas.**

A page reference has been corrected in the last sentence of the second paragraph on p. IV.327 as follows:

> **The project would not place aquatic organisms at more risk (see ~~IV.~~III.I. Contamination and Environmental Risk, ~~p. IV.162~~pp. III.161 - III.162, for further discussion of the conclusions of the risk analysis).**

An endnote reference mark has been added to the end of the first partial paragraph on p. IV.328 and the reference in parentheses deleted as follows:

> **...also would be inconsistent with the Basin Plan water quality objective that "waters shall not contain floating material, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses.[14] ~~(see Appendix G, Water Quality and Aquatic Ecology, pp. A.165 - A.168).~~**

The corresponding reference has been added to the endnotes on p. IV.329:

> **14. San Francisco Bay Regional Water Quality Control Board, San Francisco Bay Basin (Region 2), *Water Quality Control Plan*, June 21, 1995.**

The first sentence of the first complete paragraph on p. IV.334 has been revised as follows:

> **The increase in activity in the project area related to increased neighborhood-related activities could create additional noise and litter effects in the project area before and after games and other events, which occur to a large extent in the evening hours.**

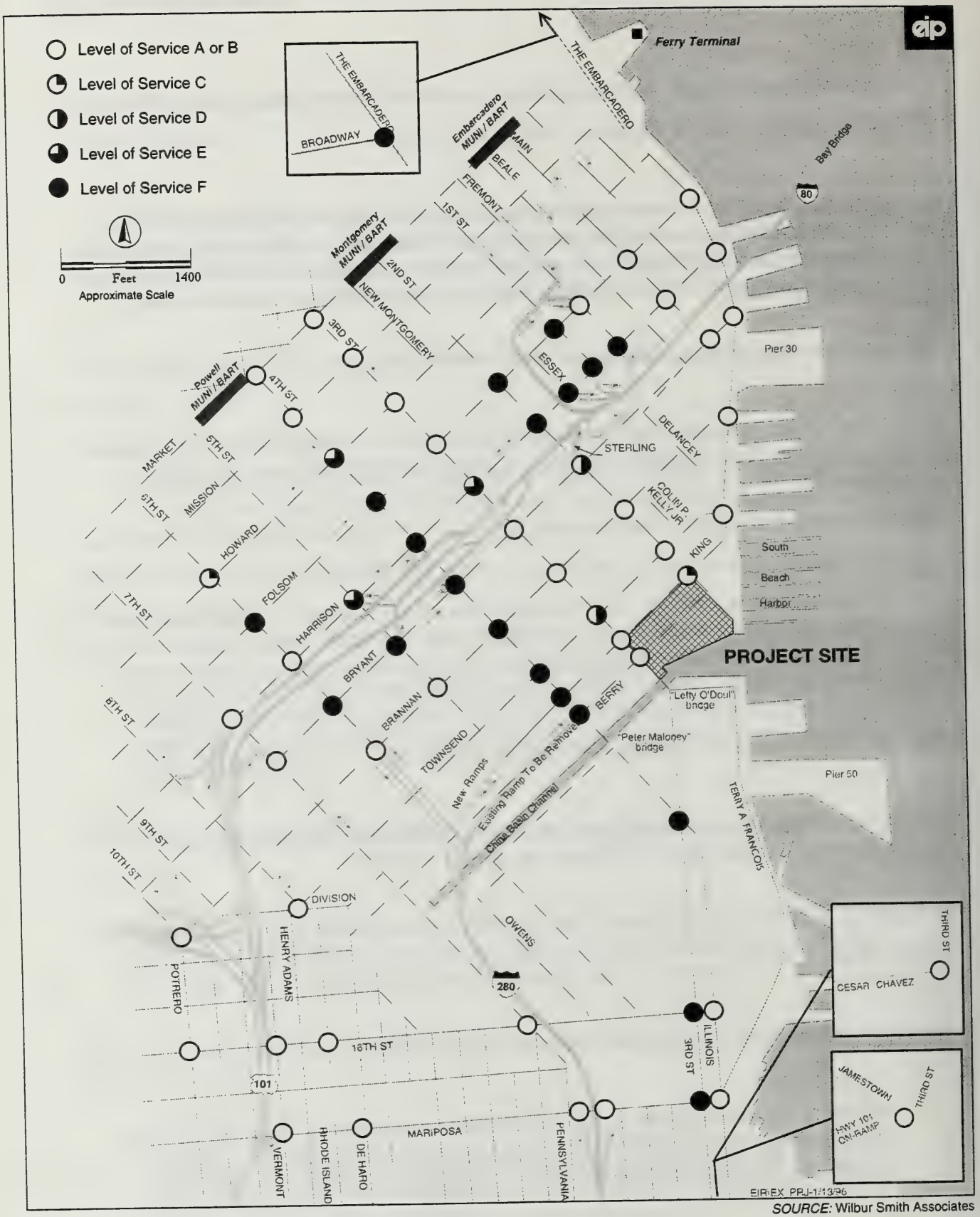
The last sentence on p. IV.334 has been revised as follows:

> **The effects of ~~ballgame~~ballpark noise and traffic noise on adjacent areas is discussed further in IV.F. Noise, pp. IV.237 - IV.263.**

In Figure V.B.1, on p. V.8, "Giants Parking Lots" has been added next to the square shown in the legend.

The first complete sentence of the bulleted item on p. V.10 has been revised as follows:

> **MUNI is considering both a one-way routing—northbound crossing the Lefty O'Doul Bridge on Third Street and southbound crossing the Peter Maloney Bridge on Fourth Street—and a two-way routing using ~~Third~~Fourth Street.**



SOURCE: Wilbur Smith Associates

GIANTS BALLPARK

Figure IV.E.3 Existing + Project LOS
Weekday Night Pre-Game Scenario (6:30 - 7:30 p.m.)

In Table V.B.1, pp. V.19 - V.24, the last column under Existing Redistributed + Project Traffic (Detoured) has been revised as follows:

Weekend Day 4:00-5:00 PM

On p. 2 of 6 of Table V.B.1 (p. V.20 of the EIR) the levels of service for Bryant Street at Fourth Street under Existing Redistributed + Project, in both the Weekday Night 10:30-11:30 PM and Weekend 4:00-5:00 PM columns, have been corrected from N/A to B.

On p. 6 of 6 of Table V.B.2 (p. V.31 of the EIR) the Impact column for The Embarcadero/Broadway intersection has been corrected as follows:

3:30-4:30 PM: LOS ~~F~~E to LOS C
6:30-7:30 PM: LOS F to LOS C

The paragraph at the bottom of p. V.34 has been revised as follows:

Table V.B.3 shows the levels of service that would result after all of the proposed temporary and permanent intersection and street improvement measures (see Table V.B.2, pp. V.26 - V.31) are implemented at the ~~35~~33 intersections that would be at a level of service E ~~of~~or F for one or more time periods for the existing-plus-project traffic with the detours and the preliminary traffic routing plan. During the 3:30 - 4:30 p.m. period after a weekday afternoon game, seven intersections would remain at LOS F and three would remain at LOS E after the street improvements were in place, compared with 30 intersections which would be at level of service F during this period under the detour and preliminary traffic routing plan without the improvements, and with ~~22~~23 intersections at level of service F under the existing-plus-project condition (no detours or improvements).

The second paragraph on p. V.39 has been revised as follows:

After an evening game, at 10:30 -11:30 p.m., no intersections would remain at LOS F, as the improvements would mitigate traffic conditions at the ~~five~~ seven intersections that would have been at LOS F under the existing-plus-project

condition with the preliminary traffic routing plan and detours. For this time period, ~~four~~ five intersections would be at LOS F under the existing-plus-project condition without the preliminary plan and improvements. Similarly, after a weekend afternoon game, 4:00 - 5:00 p.m., no intersections would remain at level of service F with the preliminary traffic routing plan and improvements as compared with nine LOS F intersections under the existing-plus-project conditions with the preliminary traffic routing plan. Prior to the application of the detours and improvements, a total of eight intersections were at LOS F.

The following correction has been made to the page reference in the second sentence of the last paragraph on p. V.40:

These are, in addition to the proposed MUNI bus bridge and the added service on the MUNI Metro MMX light rail service, other transit services that are assumed to be provided and are described below under Transit Mitigation Measures, pp. V.48 - V.54.

The last sentence of the last bulleted item on p. V.44, which continues on p. V.45, has been revised as follows:

This would reduce project traffic and transit travel during the height of the peak commute traffic period (the Lefty O'Doul Bridge would be open to vehicular traffic during the ballgame and closed to vehicles before and after games) and the time when MUNI resources are fully deployed.

A page reference in the third sentence of the paragraph under MUNI Metro Extension on p. V.48 has been corrected as follows:

Consequently, in order to facilitate pedestrian movement and allow more room for queuing, it is proposed to close King Street between Second and Third Streets for approximately one hour before and after games (see Figure V.B.4) as noted in Traffic Routing Plan, pp. V.6 - ~~V.12~~V.17.

The address of the State Lands Commission on p. IX.1 has been corrected as follows:

State Lands Commission
~~1807 Thirteenth Street~~
100 Howe Avenue, #100 South
Sacramento, CA 95825-8202

The following correction has been made to the listing for the San Francisco Redevelopment Agency on p. IX.2 as follows:

Attn: Thomas Conrad
Stan Muraoka
Michael Kaplan

The following names and addresses have been added to the Regional Agencies listing on p. IX.2:

Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Ellen Garvey, Air Pollution Control Officer

Bay Area Rapid Transit District
800 Madison Street
Oakland, CA 94607
Attn: Thomas E. Margro, General Manager

The following has been added to p. IX.2 under City and County of San Francisco:

Port of San Francisco Commission
Ferry Building, Suite 3100
San Francisco, CA 94111
Michael Hardeman, President
Denise McCarthy, Vice President
Frankie Lee
James Herman

The following names and addresses have been added to the City and County of San Francisco listing on p. IX.4:

San Francisco Community College District
50 Phelan Avenue
San Francisco, CA 94103
Attn: Del Anderson, Chancellor

Board of Supervisors
City and County of San Francisco
401 Van Ness Avenue, 3rd Floor
San Francisco, CA 94102
Attn: Barbara Kaufman, President

San Francisco Unified School District
135 Van Ness Avenue
San Francisco, CA 94102
Attn: Waldemar Rojas, Superintendent

In addition to these changes, names of community neighborhood groups and other interested individuals have been added to the distribution list, the duplication of names has been corrected, and typographical and spelling errors have been corrected.

The original signature pages for the Initial Study in Appendix A have been included in the Final EIR.

Page III.129 references Table X.E.1, in Appendix E. Air Quality. This table was omitted from the Draft EIR. It is shown on the following page and has been included in the appendix of the EIR on page A.145a.

TABLE X.E.1
SUMMARY OF RECORDED AIR POLLUTANT LEVELS IN SAN FRANCISCO

	Ozone		Nitrogen Dioxide		Carbon Monoxide			PM_{10}	
Year	1-hr High	Number of Exceedances	1-hr High	Number of Exceedances	1-hr High	Number of Exceedances	8-hr High	24-hr High	Number of Exceedances
1995	0.09	0	0.09	0	9.0	0	5.5	50	0
1994	0.06	0	0.09	0	7.5	0	5.3	na	6
1993	0.08	0	0.08	0	10	0	6.9	69	5
1992	0.08	0	0.09	0	10	0	7.4	81	9
1991	0.05	0	0.10	0	14	0	8.4	109	15
1990	0.06	0	0.11	0	12	0	6.9	165	12

Note: The High is the highest concentration for the year. Exceedances for ozone, nitrogen dioxides and carbon monoxide refer to federal and state standards, while those for PM_{10} refer only to state standards. The ozone, nitrogen dioxide, and inhalable particulate data were collected at the 10 Arkansas Street station. The carbon monoxide data were collected at the 939 Ellis Street station. The ozone, nitrogen dioxide, and carbon monoxide data are presented in parts per million. The PM_{10} data are presented in micrograms per cubic meter. na = not available.

Source: California Air Resources Board, *California Air Quality Data Summaries 1995, 1993, 1992, 1991, 1990;* Bay Area Air Quality Monitoring District, Air Currents, April 1995.

The following revision has been made to the last name listed under San Francisco Department of City Planning, on the first page of Chapter XI:

William Wycko, AICP, Associate Transportation Planner

The staff names under San Francisco Redevelopment Agency, on the first page of Chapter XI, have been revised as follows:

William Nakamura, Manager, Technical Services
Thomas G. Conrad, Principal Planner
Stanley Muraoka, Associate Planner

The following has been added to the first page of Chapter XI, to follow the San Francisco Redevelopment Agency listing:

Office of the City Attorney
City and County of San Francisco
1390 Market Street
San Francisco, CA 94102
Louise H. Renne, City Attorney
Kate H. Stacy, Deputy City Attorney

The following revisions have been made to the EIR Consultants listing:

EIP Associates
601 Montgomery Street, Suite 500
San Francisco, CA 94111
Nancy Cunningham Clark, Project Director
Kimberly M. Avila, FEIR Project Manager (Land Use, Growth Inducement, Alternatives)
Lezley Buford, AICP, DEIR Project Manager (Plans and Policies, Visual Quality and Lighting)
Ted Adams and Michael Rice, AICP (Visual Quality and Lighting)
George Burwasser (Seismicity)
Sangeeta Goyal (Contamination and Environmental Risk)
Geoff Hornek (Noise, Air Quality)
Michael Weber (Noise)

Rita Lee (Water Quality and Aquatic Ecology)
Michael Rice, AICP (Shadows and Wind)
S. Elizabeth Haines, Editor
Andrew Lynch, Lead Word Processor
Valerie Reichert, Graphic Artist

The following revision has been made to the second name under Organizations and Persons Consulted, City and County of San Francisco, Planning Department, on the fourth page of Chapter XI:

Catherine Bauman, AICP, Planner

The following revisions have been made to the fourth and fifth names listed under Organizations and Persons Consulted, City and County of San Francisco, Port of San Francisco, on the fourth page of Chapter XI:

Alec Bash, AICP, Planner
Kari Kilstrom, AICP, Planner

ADDITIONAL CORRECTIONS

A number of typographical, grammatical, punctuation, formatting and spelling errors have been corrected.